



Housing Authority of the Birmingham District



2024

PHA ANNUAL PLAN



The PHA Annual Plan is a comprehensive guide to public housing agency (PHA) policies, programs, operations, and strategies for meeting local housing needs and goals submitted annually to the Department of Housing and Urban Development (HUD). Included in this packet is the Annual Plan Form to be submitted to HUD annually.

Executive Summary

The Housing Authority of the Birmingham District (HABD) was incorporated in 1935 to address the housing needs of low-income families in Birmingham. Since that time, HABD has grown to be the largest housing authority in Alabama and the 17th largest in the country under the public housing program. Currently, HABD has over 4000 units of public housing and over 6000 housing choice vouchers. Attached is HABD's Annual Plan for the 2024 Fiscal Year (July 1, 2023 – June 30 2024). The following plan elements were revised by HABD:

- Statement of Housing Needs and Strategy for Addressing Housing Needs
- Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions
- Financial Resources
- Rent Determination
- Operation and Management
- Homeownership Programs
- Community Service and Self-Sufficiency Programs
- Safety and Crime Prevention
- Asset Management
- Substantial Deviation
- Significant Amendment/Modification
-

In addition, HABD has new activities planning, which include the following plan elements:

- Hope VI or Choice Neighborhoods
- Demolition and/or Disposition
- Conversion of Public Housing to Tenant-Based Assistance
- Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD
- Occupancy by Over-income Families
- Project-Based Vouchers
- Units with Approved Vacancies for Modernization
- Other Capital Grant Programs

Since its inception, HABD has led the development of affordable housing for low-income families in the City of Birmingham. During this plan year, HABD will continue to execute programs in accordance with the 5-Year Plan and this document to better serve current residents, participants, applicants, and the greater community. HABD is designated a Standard PHA and thus submits the HUD-50075-ST.

Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 03/31/2024
--	---	--

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS or SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.																																
A.1	<p> PHA Name: <u>Housing Authority of the Birmingham District</u> PHA Code: <u>AL001</u> PHA Type: <input checked="" type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2023</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units <u>4090</u> Number of Housing Choice Vouchers (HCVs) <u>6155</u> Total Combined Units/Vouchers <u>10245</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a Joint PHA Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th rowspan="2" style="width: 25%;">Participating PHAs</th> <th rowspan="2" style="width: 10%;">PHA Code</th> <th rowspan="2" style="width: 25%;">Program(s) in the Consortia</th> <th rowspan="2" style="width: 20%;">Program(s) not in the Consortia</th> <th colspan="2" style="width: 20%;">No. of Units in Each Program</th> </tr> <tr> <th style="width: 10%;">PH</th> <th style="width: 10%;">HCV</th> </tr> </thead> <tbody> <tr> <td>Lead PHA:</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program		PH	HCV	Lead PHA:																							
Participating PHAs	PHA Code					Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program																									
		PH	HCV																														
Lead PHA:																																	

B.	Plan Elements
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>(a) Have the following PHA Plan elements been revised by the PHA?</p> <p>Y N</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> <input type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs <input checked="" type="checkbox"/> <input type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. <input checked="" type="checkbox"/> <input type="checkbox"/> Financial Resources. <input checked="" type="checkbox"/> <input type="checkbox"/> Rent Determination. <input checked="" type="checkbox"/> <input type="checkbox"/> Operation and Management. <input type="checkbox"/> <input checked="" type="checkbox"/> Grievance Procedures. <input checked="" type="checkbox"/> <input type="checkbox"/> Homeownership Programs. <input checked="" type="checkbox"/> <input type="checkbox"/> Community Service and Self-Sufficiency Programs. <input checked="" type="checkbox"/> <input type="checkbox"/> Safety and Crime Prevention. <input type="checkbox"/> <input checked="" type="checkbox"/> Pet Policy. <input checked="" type="checkbox"/> <input type="checkbox"/> Asset Management. <input checked="" type="checkbox"/> <input type="checkbox"/> Substantial Deviation. <input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification <p>(b) If the PHA answered yes for any element, describe the revisions for each revised element(s):</p> <p>(c) The PHA must submit its Deconcentration Policy for Field Office review.</p>
B.2	<p>New Activities.</p> <p>(a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year?</p> <p>Y N</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> <input type="checkbox"/> Hope VI or Choice Neighborhoods. <input type="checkbox"/> <input checked="" type="checkbox"/> Mixed Finance Modernization or Development. <input checked="" type="checkbox"/> <input type="checkbox"/> Demolition and/or Disposition. <input type="checkbox"/> <input checked="" type="checkbox"/> Designated Housing for Elderly and/or Disabled Families. <input type="checkbox"/> <input checked="" type="checkbox"/> Conversion of Public Housing to Tenant-Based Assistance. <input checked="" type="checkbox"/> <input type="checkbox"/> Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Over-Income Families. <input type="checkbox"/> <input checked="" type="checkbox"/> Occupancy by Police Officers. <input type="checkbox"/> <input checked="" type="checkbox"/> Non-Smoking Policies. <input checked="" type="checkbox"/> <input type="checkbox"/> Project-Based Vouchers. <input checked="" type="checkbox"/> <input type="checkbox"/> Units with Approved Vacancies for Modernization. <input checked="" type="checkbox"/> <input type="checkbox"/> Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). <p>(b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.</p>
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.</p>

B.4	Capital Improvements. Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. The 5-year action plan was approved by HUD on August 3, 2020.
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N <input checked="" type="checkbox"/> <input type="checkbox"/> (b) If yes, please describe: Please See Attachment.
C. Other Document and/or Certification Requirements.	
C.1	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y N <input checked="" type="checkbox"/> <input type="checkbox"/> (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
C.2	Certification by State or Local Officials. Form HUD 50077-SL , <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i> , must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i> , must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y N <input type="checkbox"/> <input checked="" type="checkbox"/> If yes, include Challenged Elements.
C.5	Troubled PHA. (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A <input type="checkbox"/> <input type="checkbox"/> <input checked="" type="checkbox"/> Type text here (b) If yes, please describe:

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing (AFFH).

Provide a statement of the PHA’s strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.

<p>Fair Housing Goal:</p> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>Goal: Ensure equal opportunity and affirmatively further fair housing</p> <p>Strategy 1 HABD will, on an ongoing basis, review fair housing policies and procedures with resident/participant and outside stakeholder groups. HABD will create a Fair Housing Advocacy Committee comprised of a diverse group of clients served by HABD and community partners to advise HABD on the needs of residents, participants, applicants, and the larger Birmingham community.</p>
<p>Fair Housing Goal:</p> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>Strategy 2 HABD will form a working group of staff from across the Agency to become subject matter experts through ongoing training and collaborative efforts to ensure the Agency advances the principles of fair housing throughout its practices.</p> <p>Strategy 3 HABD will implement modernization and development activities in a manner that meets or exceeds current ADA and accessibility requirements.</p>
<p>Fair Housing Goal:</p> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>Strategy 4 Through annual training and ongoing campaigns, HABD will ensure that staff are knowledgeable of laws and regulations concerning fair housing, and are equipped to effectively implement HABD policy and procedure.</p> <p>Strategy 5 HABD will utilize all communication means (such as website, social media, print media, etc.) to inform residents, participants, applicants, landlords, and other partners of fair housing rights and responsibilities.</p>

Instructions for Preparation of Form HUD-50075-ST Annual PHA Plan for Standard and Troubled PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory**, **Number of Public Housing Units and or Housing Choice Vouchers (HCVs)**, **PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Plan Elements. All PHAs must complete this section.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the “yes” box. If an element has not been revised, mark “no.” (24 CFR §903.7)

Statement of Housing Needs and Strategy for Addressing Housing Needs. Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA’s strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA’s reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA’s admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA’s policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA’s procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA’s policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

Financial Resources. A statement of financial resources, including a listing by general categories, of the PHA’s anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

Rent Determination. A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

Operation and Management. A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

Grievance Procedures. A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

Homeownership Programs. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

Community Service and Self Sufficiency Programs. Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: 1) Any programs relating to services and amenities provided or offered to assisted families; and 2) Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

Safety and Crime Prevention (VAWA). Describe the PHA’s plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

Pet Policy. Describe the PHA’s policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

Asset Management. State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

Substantial Deviation. PHA must provide its criteria for determining a “substantial deviation” to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

Significant Amendment/Modification. PHA must provide its criteria for determining a “Significant Amendment or Modification” to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the ‘Sample PHA Plan Amendment’ found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked “yes”, describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark “yes” for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark “no.”

HOPE VI or Choice Neighborhoods. **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD’s website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6. (Notice PIH 2011-47)

Mixed Finance Modernization or Development. **1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD’s website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

Demolition and/or Disposition. With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA’s last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD’s website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

Designated Housing for Elderly and Disabled Families. Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: **1)** development name and number; **2)** designation type; **3)** application status; **4)** date the designation was approved, submitted, or planned for submission, **5)** the number of units affected and; **6)** expiration date of the designation of any HUD approved plan. **Note:** The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

Conversion of Public Housing under the Voluntary or Mandatory Conversion programs. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD’s website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>. (24 CFR §903.7(j))

Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program. Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD’s website at: [Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.](#)

Occupancy by Over-Income Families. A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA’s cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may

incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7. \(24 CFR 960.503\)](#) (24 CFR 903.7(b))

Occupancy by Police Officers. The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: [Notice PIH 2011-7. \(24 CFR 960.505\)](#) (24 CFR 903.7(b))

Non-Smoking Policies. The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: [Notice PIH 2009-21 and Notice PIH-2017-03. \(24 CFR §903.7\(e\)\)](#)

Project-Based Vouchers. Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan ([24 CFR §903.7\(b\)](#)).

Units with Approved Vacancies for Modernization. The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with [24 CFR §990.145\(a\)\(1\)](#).

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. ([24 CFR §903.7\(r\)\(1\)](#))

B.4 Capital Improvements. PHAs that receive funding from the Capital Fund Program (CFP) must complete this section ([24 CFR §903.7\(g\)](#)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on XX/XX/XXXX."

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. ([24 CFR §903.7\(p\)](#))

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. ([24 CFR §903.13\(c\)](#), [24 CFR §903.19](#))

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. ([24 CFR §903.15](#)). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan. Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. ([24 CFR §903.7\(o\)](#)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." ([24 CFR §903.9](#))

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: “To implement goals and priorities in an AFH, strategies and actions shall be included in program participants’ ... PHA Plans (including any plans incorporated therein) Strategies and actions must affirmatively further fair housing” Use the chart provided to specify each fair housing goal from the PHA’s AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless, the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction’s initiatives to affirmatively further fair housing that require the PHA’s involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.



Section B.1 contains any revisions made to the elements of the PHA Plan which are listed below. A check denotes that the PHA Plan element has been revised and a summary of each revision is attached to this section.

Statement of Housing Needs and Strategy for Addressing Housing Needs ✓

Deconcentration and Other policies that Govern Eligibility, Selection and Admissions. ✓

Financial Resources. ✓

Rent Determination. ✓

Operation and Management. ✓

Grievance Procedures.

Homeownership Programs. ✓

Community Service and Self-Sufficiency Programs. ✓

Safety and Crime Prevention. ✓

Pet Policy.

Asset Management.

Substantial Deviation. ✓

Significant Amendment/Modification. ✓

Attachment A

Revised Statement of Housing Needs and Strategy for Addressing Housing Needs



B.1. Revision of PHA Plan Elements

ATTACHMENT A: STATEMENT OF HOUSING NEEDS AND STRATEGY FOR ADDRESSING HOUSING NEEDS

According to the 2021 American Community Survey 1-Year Estimate data set (Financial Characteristics, S2503), Birmingham's median household income is \$36,614, a slight and statistically insignificant decrease of \$139 since 2019. This stagnation follows a period, between 2017 and 2019, when median income grew by almost 9%. While income has not changed, the median gross rent increased by nearly 7% (ACS Selected Housing Characteristics, DP04). In 2019, 44% of Birmingham renters used at least 35% of their income for housing costs; that figure is now above 50%. This trend is unfortunately unsurprising, illustrating the sustained and growing need for affordable housing in Birmingham.

HUD's 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data show Birmingham has almost 23,810 extremely low-income families, and nearly three quarters of those are renters. According to the City of Birmingham's Consolidated Plan, about 40% of single-person renter households are individuals over the age of 65 with a fixed income. ACS data for 2017-2021 (Disability Characteristics, S1810) show 18.4% of Birmingham's citizens have a disability including more than 20,000 people with ambulatory difficulties (defined as having serious difficulty walking or climbing stairs) and 11,982 people with independent living difficulties (defined as having difficulty doing errands alone such as visiting a doctor's office or shopping because of a physical, mental, or emotional problem).

	Persons with a disability	Percent of population
Disabled individuals in Birmingham	36,989	17.9%
DISABILITY TYPE		
With a hearing difficulty	5,836	3.0%
With a vision difficulty	9,820	4.7%
With a cognitive difficulty	14,536	7.5%
With an ambulatory difficulty	19,992	10.3%
With a self-care difficulty	7,107	3.7%
With an independent living difficulty	12,441	7.4%

Individuals served by HABD have similar rates of disability to the Birmingham community. In public housing, 14% of individuals are disabled, and 16% of individuals served in the Housing Choice Voucher program. However most elderly heads and co-heads of household are disabled, 54% in public housing households and 79% in HCV households.

	Average household size	Total people in households served	Percent with disability, among Head, Spouse, Co-head, aged 61 years or less	Percent with disability, among Head, Spouse, Co-head, aged 62 years or older	Percent with disability, among all persons in households
Public Housing	2.3	8480	23	54	14
Housing Choice Voucher	2.6	13902	25	79	16

The City of Birmingham has identified “Housing cost burden greater than 50 percent” as the most critical problem that low and extremely low-income households face and renters are particularly at risk for these burdens. Complicating the cost of housing is the state of the housing stock in Birmingham which is aging, in need of repair and modernization to avoid falling into unlivable conditions and rendering the occupants at risk of homelessness.

This brief review of housing need data shows the continued need not only for rental assistance programs such as the Housing Choice Voucher program to help families afford to rent homes, but also for hard units, such as the public housing program and other units managed by the Agency. HABD’s housing stock is aged similar to the city’s stock and our repositioning strategy has the following goals:

- a. Enhancing the quality of affordable units and the neighborhoods in which they are located
- b. Maintaining or increasing the number of units available
- c. Increasing the number of affordable housing outside of racially/ethnically-concentrated areas of poverty (R/ECAPs)
- d. Ensuring the accessibility of units matches the needs of current residents and residents of the jurisdiction

HABD has set an ambitious goal to maintain the same number of units through the repositioning, and indeed will seek ways to increase the number of units available. Similarly, we will pursue all available opportunities to increase rental assistance through a variety of partnerships such as the HUD-VASH program and others.

Our ability to serve families on our waiting list is greatly impacted by management practices, and where possible, streamlining, new technologies and other strategies will be implemented to maximize the number of families the Agency serves.

Attachment B
Revised Deconcentration and Other
Policies that Govern Eligibility, Selection,
and Admissions



ATTACHMENT B: DECONCENTRATION and OTHER POLICIES that GOVERN ELIGIBILITY, SELECTION, and ADMISSIONS

Deconcentration Rule (Housing Operations)

The objective of the deconcentration rule for public housing units is to require that families are housed in a manner that will prevent a concentration of poverty families and/or a concentration of higher income families in any one development. The HABD ACOP outlines specific objective of HABD is to house no less than 40 percent of its public housing inventory with families that have income at or below 30% of the area median income by public housing development. HABD will take action to require that no individual development has a concentration of higher income families in one or more of the developments. To assure that HABD does not concentrate families with higher income levels, it is the goal of HABD not to house more than 60% of its units in any one development with families whose income exceeds 30% of the area median income. HABD will track the status of family income, by development, on a monthly basis.

The average annual income of HABD Public Housing Communities is as follows:

Elyton Village: \$12,973 (AL001000001)	Rev. Dr. Morell Todd Homes: (AL001000011) \$10,569	Ralph Kimbrough Homes: (AL001000018) \$14,413
Southtown Court: \$13,309 (AL001000004)	Collegeville Center: (AL001000013) \$11,821	Benjamin Greene Village: (AL001000023) \$14,781
Charles P. Marks Village: (AL001000006) \$10,678	Russell B. Harris Homes: (AL001000014) \$16,790	
Smithfield Court: \$10,806 (AL001000009)	North Birmingham Homes: (AL001000016) \$12,627	
Tom Brown Village: (AL001000010) \$13,972	Cooper Green Homes: (AL001000017) \$17,051	

The current (2022) HUD-published Median Income for the Birmingham-Hoover metropolitan area is \$84,800.00. Based on this amount, 30% of the area Median Income is \$25,440.00. HABD currently has no site with average income at or above 30% of the median income.

Economic and Social Deconcentration: Selection will be made in such a manner to avoid concentrations of the most economically and socially deprived families in one or all of the housing communities operated by the HABD and to maintain a resident population in each housing community composed of families with a broad range of income and rent paying ability that is generally representative of the range of low-income families in the HABD's area of operation as defined by state law.

Deconcentration and Income Mixing: The Housing Authority of the Birmingham District has the following plans and/or policies that impact deconcentration and income mixing:

- **Flat Rents:** The HABD is required to establish flat rents, per bedroom size, based on 80% of the fair market rent (FMR) of Birmingham-Hoover Metropolitan Statistical Area. The agency began applying the flat rent policy in October 2014. Since that time

all qualifying new applicants pay the new flat rent effective at move in. Households on flat rent prior to enactment of the new 80% FMR rule have been subject to a 35% annual increase in flat rent at the time of yearly re-certification up to the 80% FMR amount

- **Homeownership Program:** The HABD has an active homeownership program to identify and assist families that may qualify for homeownership opportunities. The attraction of higher income working families to public housing will enable the HABD to develop a larger pool of qualified families. The minimum yearly income required for participation in the program is \$15,000.00.
- **Improvements and Upgrades:** The HABD is dedicated to improving living conditions at all sites through various forms of upgrades and redevelopment in order to make its housing portfolio more competitive with private sector housing. An ongoing lighting plan in conjunction with Alabama Power has brought about replacement of all exterior lighting. Old lighting has been upgraded to brighter and more energy efficient LED lighting. Redevelopment of Loveman Village through HUD's Rental Assistance Demonstration (RAD) program will provide opportunities to attract more working families attracted to new construction in both traditional and new neighborhoods. Further redevelopment and upgrades to Southtown, Marks Village, Freedom Manor, and other sites are also planned.
- **Working Family Preference:** HABD has a working family preference for select sites in order to attract working families public housing communities, thus assisting further with deconcentration efforts.

Other Policies that Govern Eligibility, Selection, and Admissions (Public Housing)

How to Apply:

Families wishing to apply for public housing shall complete an application for public housing assistance. Applications may be made in person or online. Completed applications will be accepted for all applicants and the information will be verified by the HABD. Submitted applications are dated and time-stamped to ensure proper waiting list placement. Reasonable accommodations are available to any qualified individual to assist in the application process. In FY 2024 HABD plans to relocate its Public Housing Intake Department from the McCoy Building to Elyton Village.

Interviews and Verification Process:

Applicants are given the opportunity to complete their applicant file via an interview once they approach a selection position from the waiting list. Failure to attend an interview will subject an applicant to the withdrawal of their application.

Closing of Application Taking

HABD may close the taking of applications if the site waiting list is such that additional applicants would not be able to occupy a public housing unit within the next twelve (12) month

period. Application taking may be suspended by bedroom size, if applicable. Currently, HABD IS NOT accepting applications for one (1) and two (2) bedroom units and these waiting lists are CLOSED until further notice.

Opening of Application Taking

When HABD begins taking applications, the waiting list may be opened by bedroom size. HABD will make known to the public through publication in a newspaper of general circulation, minority media, and other suitable means the availability and nature of housing assistance for eligible families.

Admission Eligibility

HABD is responsible for screening family behavior and suitability for tenancy. All families who are admitted to HABD's public housing program must be determined eligible according to HUD requirements and HABD requirements which are contained in the Agency's Admissions and Continued Occupancy Policy (ACOP). The following subject matters were updated in the Administrative Plan:

Section IV: Definition of Terms

Veteran/Veteran Family: Person that is currently serving or has served in any branch of the United States military, including the National Guard or Reservist, spouses, or their surviving spouse.

Surviving Spouse: a person who had a valid marriage to a veteran and who was the spouse of the veteran at the time of the veteran's death; lived with the veteran continuously from the date of marriage to the date of death, and/or, a veteran and/or spouse as defined by the U.S. Department of Veteran Affairs at

<https://www.va.gov/>

Section XIV: Orientation of Families and Issuance of Housing Voucher -Voucher Term

Voucher Term: The term of the voucher is 90 days from the date of issuance. Prior to expiration, the family may contact the HA to inquire about assistance the HA can provide the family in locating suitable housing. The family must submit a Request Tenancy Approval within the 60-90 day period unless an extension has been granted by the HA. Once the family has submitted a Request for Tenancy Approval the clock is stopped and/or suspended on the term of the voucher (See "Suspension"). If the unit is not approved for any reason, the remaining days will be reinstated. If the initial term is not adequate for finding a unit to lease, the family may request an extension of the initial term as described below.

Requesting for Extensions of the Term

A family may request an extension of the Voucher time-period. All requests for extensions should be received prior to the expiration date of the Voucher. Extensions are permissible at the discretion of the HA primarily for the following reasons:

A. Extenuating circumstances such as hospitalization or a family emergency for an extended

period of time which has affected the family's ability to find a unit within the initial 60-90-day time period. The HA representative will verify the extenuating circumstances prior to granting an extension.

B. The family has evidence that they have made a consistent effort to locate a unit and request support services from the HA, throughout the initial 60- 90-day period with regard to their inability to locate a unit.

C. The family has turned in a Request for Lease Tenancy Approval prior to the expiration of the 60- 90-day time period, but the unit has not passed HQS.

PHA Error

If the HABD makes an error in the bedroom size designation, the family will be issued a Voucher of the appropriate size at the time the error is discovered. If the family decides to remain in the same unit, and it is not overcrowded, the payment standard will be corrected to the lower of the new voucher size, or the actual unit size effective on the reexamination date.

Exhibit A: Local Waiting List Preferences

Litigation Action (5) is defined as having been a person(s) who has undergone legal actions related to resolving a dispute through the judicial court system. or as part of a settlement agreement, a housing choice voucher was selected. The Housing Authority of the Birmingham District (HABD) will use the following local preferences and assigned points for all HABD Section 8 waiting lists, including tenant-based and project-based voucher; RAD and non-RAD properties:

*Please note, each site-based waiting list may include additional waiting list preferences. Please see each site listing for additional details and specific waiting list preferences included.

Exhibit H: Project-Based Waiting List -The Villas at Titusville

The Housing Authority of the Birmingham District (HABD) hereby establishes the Project-Based Voucher Program and waiting list for The Villas at Titusville. The establishment of this program is consistent with the Authority's Plan, Five-year Plan, and Strategic Plan.

The Villas at Titusville will have 5 the following local preferences:

- Working Family 7 points
- Elderly/Disabled 7 points
- Veterans 8 points
- Public Housing Demo/Dispo 5 points
- Public Housing Crime Victims 5 points
- Public Housing Uninhabitable 5 points

The Villas at Titusville will have 7 the following local preferences:

- Working Family 7 points
- Elderly/Disabled 7 points
- Veterans 8 points
- Public Housing Demo/Dispo 5 points
- Public Housing Crime Victims 5 points
- Public Housing Uninhabitable 5 points
- Litigation Action 5 points

Exhibit K: Choice Mobility for Rental Assistance Demonstration-Section 8 Project Based Rental Assistance (PBRA) Properties

Addendum to Section 8 Administrative Plan

The Section 8 Project Based Rental Assistance Program (PBRA) was authorized by Congress in 1974 to provide rental subsidies for eligible families residing in newly constructed, substantially rehabilitated, and existing rental and cooperative apartment projects. PBRA is one of the funding platforms that public housing units can be transitioned to under the Rental Assistance Demonstration (RAD) program.

Family Choice to Move with Continued Assistance/Choice Mobility

Under RAD PBRA, residents have the right to move with tenant-based assistance after the latter of 24 months from the date of execution of the HAP contract or 24 months after the move-in date. This policy outlines how HABD will implement the HUD requirements for RAD PBRA Choice Mobility.

HCV Inventory Program CAP

HUD affords PHAs the opportunity to limit (cap) the number of Choice Mobility moves under the PBRA Program. As such, HABD will limit its number of Choice Mobility moves to no more than one-third of its annual HCV turnover vouchers to residents of RAD PBRA properties. Once the maximum number of RAD PBRA Choice Mobility HCVs have been issued within any given year, additional requests will be placed on a waiting list. HABD will create and maintain a waiting list in the order in which the requests from eligible households were received.

Project Turnover Cap

HABD may negotiate the number of Choice-Mobility moves exercised by eligible households to 15 percent of the assisted units in the RAD PBRA property. (For example, if the project has 100 assisted units, the Project Owner (if not owned by HABD) and HABD could limit the number of families exercising Choice Mobility to 15 in any year, but not less than 15.) HABD will create and maintain a waiting list for requests that exceed the Project Turnover Cap.

Additional Program Requirement

Residents wanting to transfer assistance from PBRA to HCV must comply with requested documentation requested by the Department. This includes verification of 24-month residency in a PBRA unit (in connection with the HABD), and any applicable household information.

A. Section XI: Selection and Participation Plan – Housing Voucher

Housing Voucher Selection and Participation Plan

B. Vouchers for Foster Youth to Independence Initiative (FYI)

C. Exhibit K: Foster Youth to Independence (FYI) Initiative

Vouchers provided by HUD for youth eligible under the Family Unification Program (FUP) is subject to availability.

Special Preference

The HABD hereby establishes a waiting list preference for the FYI Initiative,

whereas youth referred by the Alabama Department of Human Resources must be certified by said agency, has attained at least 18 years and not more than 24 years of age, left foster care or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act at age 16 or older, and is homeless or at risk of becoming homeless at age 16 or older.

At the time of application, initial determination of an applicant's entitlement to the HABD local preference for FYI as described above, may be made on the basis of the applicant receiving certification from the Alabama Department of Human Resources and must be verified upon selection from the waiting list. The preference points available for the FYI Initiative will be ten (10) points.

Funding

- a. HABD may request a minimum of one (1) voucher and a maximum of twenty-five (25) vouchers per federal fiscal year. Additional vouchers may be requested with 90 percent or greater utilization.

Youth Eligibility

- a. Is homeless or is at risk of becoming homeless at age 16 or older.

Additional Program Requirements

- a. **Turnover:** Vouchers awarded under this notice for eligible youth will continue to be used for other eligible youth upon turnover. If another eligible youth is not available, the PHA must notify HUD, and HUD will reduce the PHA's HCV assistance to account for the removal of the FYI assistance from the PHA's HCV baseline. HUD will monitor the utilization of vouchers awarded through this notice on an annual basis and any unutilized voucher assistance that is no longer needed will be recaptured and reallocated as authorized under the 2020 Act.
- b. **Youth Failure to Use Voucher:** Should a youth fail to use the voucher, the PHA may issue the voucher to another eligible youth if one has been identified. If another eligible youth is not available, the PHA must notify HUD, and HUD will reduce the PHA's HCV assistance to account for the removal of the FYI assistance from the PHA's HCV baseline.
- c. **Waiting List Administration:** Upon receipt of a referral(s) from the Alabama Department of Human Resources of an eligible youth, compare the name(s) with youth already on the PHA's HCV waiting list. Any youth on the PHA's HCV waiting list that matches with the Alabama Department of Human Resources' referral must be assisted in order of their position on the waiting list in accordance with PHA admission policies. Any youth certified by the Alabama Department of Human Resources as eligible and not on the HCV waiting list must be placed on

the waiting list (pending HCV eligibility determination). Due to the nature of FYI vouchers, the waiting list will always remain open for FYI referrals.

SECTION XIV: Orientation of Families and Issuance of Housing Voucher

Format of the Briefing

- a. **Briefing of Housing Voucher Holders:** The briefing may be done either in group or individual sessions, in person, or in a virtual setting.
- b. **Information Packet:** When a family is selected to participate in the program. HABD will provide the family a packet, in person, via mail, via electronic mail, or any other electronic means.

D. SECTION XLIII: Informal Review for Applicant; Informal Hearing for Participant

Informal Review for Applicant: The HABD must give an applicant an opportunity for an informal review of the HABD decision denying assistance to the applicant. The review procedures must comply with the following:

- a. The review may be conducted in person, over the phone, virtual platform, or any other platform that HABD deems necessary to conduct said reviews;

The hearing may be conducted in person, over the phone, virtual platform, or any other platform that HABD deems necessary to conduct said meeting.

- a. **Special Cooperation with States Attorneys and/or Law Enforcement Agencies to Relocate:** The Authority from time to time may cooperate with states attorneys and/or law enforcement agencies to relocate households eligible for rental assistance for protection of potential witnesses. Such action will be taken with administrative discretion and approval of the Authority's President/CEO or designee. An example of such action may but not necessarily be limited to, a household whose member (s) has extended them self in the public interest which placed them in personal jeopardy.
- b. **Special Transfers of Relocation by Authority/Victims of Crime in Public Housing:** The Authority from time to time may need to relocate or transfer a household to and from our Section 8 or Public Housing Programs for various reasons. Such action will be taken with administrative discretion and approval of the Authority's President/CEO or designee.

Organization of the Waiting List: The HABD waiting list must contain the following information for each applicant listed:

- a. Qualification for any local preference, if available;
- b. When a housing voucher is available, the HABD will select the applicant who according to date and time of the application, and as sorted by the computer, has the oldest application on the waiting list with a local housing preference, if available/applicable.

E. Removal of all local preferences for homeless, displaced, and working families and addition of three new preferences

F. Local Waiting List Preferences

HABD will use the following local preferences and assigned points:

- a. **Public Housing Demo/Dispo (5)-** is defined as person(s) legally occupying a unit in a specified public housing community, on the date the community was approved by HUD to be disposed or demolished.
- b. **Public Housing Crime Victims (5)-** is defined as having been a victim of a violent crime or a witness providing testimony to law enforcement of a violent crime which occurred in or around the public housing community.
- c. **Public Housing Uninhabitable (5)-** is defined as person(s) legally occupying a unit that is deemed unsafe or uninhabitable and there is no other appropriate unit available in the public housing community in which they reside.
- d. **Veteran/Veteran Family (8)-** is defined as person(s) [This preference is only for the Villas at Titusville.] that is currently serving or has served in any branch of the United States military, including the National Guard or Reservist, spouses, or their surviving spouse. Surviving Spouse: a person who had a valid marriage to a veteran and who was the spouse of the veteran at the time of the veteran's death; lived with the veteran continuously from the date of marriage to the date of death, and/or, a veteran and/or spouse as defined by the U.S. Department of Veteran Affairs at <https://www.va.gov/>
- e. **Litigation (5)-** is defined as having been a person(s) who has undergone legal actions related to resolving a dispute through the judicial court system, and as part of a settlement, an HCV was selected.

HABD will use the following local preferences for selected PBVs waiting lists managed by HABD:

Selection Criteria: The waiting list selection criteria is consistent with Exhibit D: Section 8 Project- Based Voucher Program, of this Administrative Plan.

Informal Review or Hearing: The informal review process is consistent with Section X: Grounds for Denial or Termination of Assistance, of the Administrative Plan, and with Federal Regulations: 24 CDR

982.554. The owners of the Villas at Titusville have identified specific income criteria, in which each family that is eligible for the property, must have income. No family will be referred to the owner unless they can meet this criterion. Any additional suitability criterion must be determined by the owner of the property.

F. Exhibit L: Emergency Housing Vouchers (EHV)

EHVs are tenant-based rental assistance under section 8(o) of the United States Housing Act of 1937 (42 U.S.C. 1437f(o)). EHVs are to assist individuals and families who are experiencing homelessness, at risk of experiencing homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability.

The operating requirements of the EHV program have been provided in PIH Notice 2021-15, which this plan incorporates by reference, including any subsequent requirements promulgated by HUD. The Assisted Housing Department will develop procedures in compliance with PIH Notice 2021-15 and any subsequent notices.

The following definitions apply to the EHV Program:

a. Homelessness

1. An individual or family who lacks a fixed, regular, and adequate nighttime residence meaning:
 - i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park abandoned building, bus or train station, airport, or camping ground;
 - ii. An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals);
 - iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that

institution.

2. An individual or family who will imminently lose their primary nighttime residence provided that:
 - i. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - ii. No subsequent residence has been identified; and
 - iii. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.

3. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 18 U.S.C.
 - i. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C.11434a);
 - ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.

b. At Risk of Homelessness

1. An individual or family who:

- i. Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- ii. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition above; and

iii. Meets one of the following conditions:

- Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- Is living in the home of another because of economic hardship;
- Has been notified in writing that their right to occupy their 19 current housing or living situation will be terminated within 21 days of the date of application for assistance;
- Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
- Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons, or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
- Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

2. A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and

Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

3. A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42U.S.C. 11434a (2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.
- c. Individuals or families who are fleeing or attempting to flee, domestic violence, sexual assault, stalking or human trafficking. Any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This includes cases where a HUD- assisted tenant reasonably believes that there is a threat of imminent harm from further violence if they remain within the same dwelling unit, or in the case of sexual assault, the HUD-assisted tenant reasonably believes there is a threat of imminent harm from further violence if they remain within the same

dwelling unit that they are currently occupying, or the sexual assault occurred on the premise during the 90- day period preceding the date of the request for transfer.

1. Domestic violence includes felony or misdemeanor crimes of violence committed by:
 - i. A current a current or former spouse or intimate partner of the victim (the term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship).
 - ii. A person with whom the victim shares a child in common,
 - iii. A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner,
 - iv. A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or
 - v. Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.
2. Dating violence means violence committed by a person:
 - i. Who is or has been in a social relationship of a romantic or intimate nature with the victim; and

- ii. Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship;
 - The type of relationship; and
 - The frequency of interaction between the persons involved in the relationship.
- 3. Sexual assault means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.
- 4. Stalking means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:
 - i. Fear for the person's individual safety or the safety of others; or
 - ii. Suffer substantial emotional distress.
- 5. Human Trafficking (includes both sex and labor trafficking)
 - i. Sex trafficking-The recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force,

fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age;

- ii. Labor trafficking- The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.
- d. Individuals or families who are recently homeless; this category is composed of individuals and families determined by the Continuum of Care (CoC) or its designee to meet the following definition:
 - 1. Recently Homeless- Individuals and families who have previously been classified by a member agency of the CoC as homeless but are not currently homeless as a result of homeless assistance (financial assistance or services), temporary rental assistance or some type of other assistance, and where the CoC or its designee determines that the loss of such assistance would result in a return to homelessness or the family having a high risk of housing instability. Examples of households that may be defined as recently homeless by the CoC include, but are not limited to, participants in rapid rehousing, and permanent supportive housing. Individuals and families classified as recently homeless must be referred by the CoC or its designee.

2. Funding- The American Rescue Plan Act of 2021 (ARP) provides funding for fees for the costs of administering the EHV's and other eligible expenses defined by notice to prevent, prepare for and respond to coronavirus to facilitate the leasing of the emergency housing vouchers. PHAs will be allocated a one-time service agree to support its efforts in implementing and operation of an effective EHV Program that will address the needs of EHV eligible individuals and families. The following are eligible activities in which the service gees may be used for:
 - i. Housing Search Assistance
 - ii. Security Deposit/Utility Deposit/Rental Application/Holding Fee Usage
 - Application fees/nonrefundable administrative or processing fees/refundable application deposit assistance
 - Holding Fees
 - Security Deposit Assistance
 - Utility Deposit Assistance/Utility Arrears
 - iii. Owner-related Uses
 - Owner recruitment and outreach
 - Owner incentive and/or retention payments
 - iv. Other Eligible Uses
 - Moving expenses (including move-in fees and deposits)
 - Tenant-readiness services
 - Essential household items
 - Renter's insurance if required by lease
 - HABD reserves the right to allocate usage of said fees for eligible activities, described above and in PIH Notice 2021-15 (HA,) based on the individual clients' needs.
3. Waiting List-The HABD will create a separate waiting list for the EHV program which will serve as the sole waiting list for the program's referrals from the CoC, victims' services providers, or other approved agencies in which the PHA may receive referrals from, as stated in PIH Notice 2021-15(HA).
4. Additional Program Requirements-Unlike regular HCV admissions, PHAs may not deny an EHV applicant admission regardless of whether:
 - i. Any member of the family has been evicted from federally assisted housing in the §A PHA has ever terminated assistance under the program for any member of the family.
 - ii. The family currently owes rent or other amounts to the PHA or to

another PHA in connection with Section 8 or public housing assistance under the 1937 Act.

- iii. The family has not reimbursed any PHA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease.
- iv. The family breached an agreement with the PHA to pay amounts owed to a PHA, or amounts paid to an owner by a PHA.
- v. The family would otherwise be prohibited admission under alcohol abuse standards established by the PHA in accordance with §982.553(a)(3).
- vi. The PHA determines that any household member is currently engaged in or has engaged in during a reasonable time before the admission, drug-related criminal activity.

Additionally, prohibitions based on criminal activity for the eligible EHV populations regarding drug possession should be considered apart from criminal activity against persons (i.e., violent criminal activity).

The PHA must still deny admission to the program if any member of the family fails to sign and submit consent forms for obtaining information in accordance with 24 CFR part 5 as required by § 982.552(b)(3).

Voucher Search Time

The initial voucher search term for an EHV family must be at least 120 days. Any extensions, suspensions, and progress reports will remain under the current policies of the PHA and this Administrative Plan, but will apply after the minimum 120-day initial search term.

H XXIX-Changes in Subsidy Standards

- a. Determining Family Unit (Voucher) Size
 - 1. One bedroom will generally be assigned for each two family members, except in the following circumstances:
 - i. Persons of the opposite sex (other than head/co-head) will be allocated separate bedrooms
 - ii. Family members of different generations will be allocated separate bedrooms regardless of sex or age (ex. Grandmother; mother; daughter)
 - iii. Dependents of the same sex with an age differential of more than 10 years will be allocated separate bedrooms
 - iv. A pregnant individual with no other household members will be allocated a two bedroom

- v. HABD will consider alternative voucher sizes for household as a reasonable accommodation for medical purposes
- vi. Live-in attendants will be provided a separate bedroom. No additional bedrooms are provided for the attendant's family.

Voucher Size	Number of Persons	
	Minimum	Maximum
1 BR	1	2
2 BR	2	4
3 BR	3	6
4 BR	4	8
5 BR	5	10
6 BR	6	12

b. Exceptions to Subsidy Standards

The HABD shall grant exceptions from the subsidy standard if the family requests and the HABD determines, the exceptions are justified based on relationship, age, sex, health, handicap or disability of family members, or other individual circumstances.

1. Request for Separate Bedroom Due to Medical Reasons-The family must also provide written documentation justifying an additional bedroom at the time of each subsequent annual re-certification.
2. Changes for Applicants-If a family member identified in the full application will be temporarily absent for reasons not detailed in Section A. Determining Family Unit Size #5, the family voucher size will be issued without that member.

c. Unit Size Selected

The family may select a different size dwelling unit than that is listed on the voucher. The following criteria shall apply:

1. **Affordability Limitation:** If a family enters into a new lease agreement which requires the Housing Authority to execute a new HAP contract for a dwelling unit with a gross rent in excess of the payment standard as determined above, the total tenant payment cannot exceed 40% of the household's monthly adjusted income. HABD will not approve a lease for a unit that is not affordable pursuant to this 40% limitation.

Attachment C

Revised Financial Resources



Attachment C - Financial Resources

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2024 grants)		
a) Public Housing Operating Fund based 95% funding eligibility	31,004,298	
b) Public Housing Capital Fund	35,800,225	
c) HOPE VI Revitalization	- 0 -	
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	53,420,562	
f) Administrative Fund	4,128,372	
g) Public Housing Drug Elimination Program (including any Technical Assistance funds)		
h) Resident Opportunity and Self-Sufficiency Grants - ROSS	127,674	
i) Youth Build Grant based on two-year Grant period, only one year is reported	750,000	
j) HOME		
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		
3. Public Housing Dwelling Rental Income	5,400,000	Operations
4. Other income (list below)		
Income on Investments	15,000	Operations
Sales and Services	200,000	Operations
Other Income	65,000	
Total resources	130,911,131	

Attachment D

Revised Rent Determination



ATTACHMENT D: RENT DETERMINATION

Statement on Flat Rents (Property Operations)

The flat rent amounts went into effect March 1, 2023.

HABD Flat Rent Schedule January 2023 Based on 80% of Area FMR

Bedroom Size	2022 - 2023 Fair Mkt Rent	HABD Flat Rent / 80% FMR
0	866.00	693.00
1	942.00	754.00
2	1,075.00	860.00
3	1,376.00	1,101.00
4	1,494.00	1,195.00
5	1,718.00	1,374.00
6	1,942.00	1,554.00

NOTE: Federal Mandated Changes to Flat Rent.

On January 17, 2014, the President signed the Department of Housing and Urban Development (HUD) Appropriations Act of 2014. Section 210 of that act amended the United States Housing Act of 1937 to create a new rule for flat rents for all Public Housing Agencies (PHAs). On March 20, 2014, HUD issued instructions to all PHAs informing them that they must implement the new rules for flat rents effective June 1, 2014. All PHAs must revise the flat rent schedule to be at least 80% of the Fair Market Rent for their area. HUD gave PHAs the discretion to apply the new flat rent schedule to a family's next annual rent option or annual reexamination. Also, the statute limits annual flat rent increases to 35% of the existing flat rent amount. Therefore, these mandated increases will not go into effect until the next annual rent option or annual re- certification.

Rent Determination: (Section 8)

The following subject matter was updated in the Administrative Plan:

- Interim Change Policy Section XLV Reexamination of Income and Family Circumstances - Interim Redetermination of Rent

Addition of Defined Terms – The following term was added to the Administrative Plan

Fixed Income: Periodic payments at reasonably predictable levels from one or more of the following sources:

Social Security, Supplemental Security Income, Supplemental Disability Insurance

- Federal, state, local, or private pension plans
- Annuities or other retirement benefits programs, insurance policies, disability or death benefits, or other similar types of periodic receipts
- Any other source of income subject to adjustment by verifiable COLA or current rate of interest

Streamlined Income Determination for Fixed Income Sources 24 CFR 982.516(b)

PHAs are permitted to implement streamlined requirements for verifying and adjusting fixed income sources over a three-year cycle for families with an unadjusted income consisting of 90 percent or more from fixed income sources. HABD establishes the flexibility to implement the streamlined-income process for eligible households.

In the initial year (first year) of the three-year cycle, HABD will complete a full annual income determination, applicable with all HUD regulations, guidance, and HABD requirements. Year two and year three of the three-year cycle, HABD will obtain a certification from the family stating that their fixed income sources have not changed from the prior year and that their household income is still made of at least 90 percent from fixed sources. If the certification for years two and three are provided, HABD will adjust the fixed income sources based on the Cost-of-Living Adjustment (COLA) that is applicable to said income source. Non-fixed income from the previous year's calculation will be used.

When using the streamlined income determinations, the family's fixed income must be adjusted using a COLA or current interest rate that applies to each specific source of fixed income and is available from a public source or through tenant-provided, third party-generated documentation. If no public verification or tenant-provided documentation is available, third-party verification of the income amounts must be requested to calculate the change in income for the source.

HABD will create a special application for families eligible for the stream-lined process, to include a certification section, along with assets and deduction certifications. The application will also include HUD's required forms 9886 and 9887. Additional forms will be added as needed or required by HUD.

HABD must continue to abide by the Enterprise Income Verification (EIV) discrepancy requirements by addressing any discrepancies or new income sources reported in HUD's EIV system.

For any income determined pursuant to a streamlined income determination, third party verification of all income sources and amounts must be conducted every three years.

Interim Redetermination of Rent

The following changes may be reported by the family prior to the annual reexamination:

- Employment, unemployment or changes representing a decrease in income for employment of a permanent nature of the family, head, spouse or other wage earner eighteen years of age or older;
- All increases in income shall be reported during the annual reexamination period. If a household's income increases outside of the annual reexamination period, it should be reported the following period. No income increases will be processed outside of the annual reexamination period, unless the participant is on the Family Self Sufficiency (FSS) Program, in which, the reported increase in income is a positive reflection of previously set individual goals, which has an effect on their escrow account balance.

When HA Conducts Interim Reexamination

At any time, the HA may conduct an interim reexamination for a reduction in family income and change in composition.

At any time, the family may request an interim determination for a reduction in family income or change in composition because of any changes since the last determination. The HA must make the interim determination within a reasonable time after the family request.

Attachment E

Revised Operation and Management



ATTACHMENT E: OPERATION and MANAGEMENT

Statement of Rules, Standards and Policies of the PHA Governing Maintenance and Management of Housing Owned, Assisted or Operated by the PHA which includes the Prevention and Eradication of Pests.

The rules, standards, and policies governing maintenance and management are contained in the ACOP. There were no updates to the ACOP in FY 2023. In FY 2024, HABD will make updates to the ACOP to reflect improved management practices, resident rights and responsibilities, and any updated Federal or state law/regulation, to include already published regulations such as HOTMA.

HABD is concerned about the rise in tenant account receivables, and is implementing policies, procedures, and services to prevent the eviction of public housing residents.

Strategy to Prevent and Eradicate Pest Infestations

HABD utilized a professional pest control company to implement our efforts to prevent and eradicate pests. All public housing units are treated once every (30) days. Units range in size from (1) to (6) bedrooms. This contractor also provides monthly treatments to the management offices, maintenance facilities, community centers, and daycare centers throughout the Agency. Additional services on an as needed basis will include; unit knock-down treatment, bed bug treatments and rodent control (inside units, in common areas, and on the exterior of buildings).

Management of PHA Programs

HABD administers the following programs:

- Public Housing
- RAD PBRA
- RAD and Non-RAD PBV
 - Villas at Titusville I – 100 units
 - The Park at Sydney Drive – 120 units
 - YWCA – 37 units
 - Villas at Titusville II – 62 units
 - MI/MR – 30 units
- Housing Choice Voucher
- HUD-VASH – 331 vouchers
- Section 8 SRO – 17 vouchers
- Foster Youth to Independence – 13 vouchers
- Emergency Housing Voucher – 91 vouchers
- Mainstream Voucher -103 vouchers
- HCV and PH Homeownership
- Family Self-Sufficiency
- Resident Opportunity for Self-Sufficiency

- YouthBuild

Management Improvements

HABD's management is supported and advanced by an effective information technology program. Several critical programs are planned for implementation during the plan year

Objective: Implement and support methods to minimize cost and provide smarter solutions that enable better use of technology to directly support HABD and its communities in relation to HABD Agency goals and mission.

The Housing Authority of the Birmingham District has partnered with Yardi Systems to improve our vendor relations regarding vendor document management and new vendor onboarding using their Vendor Café and Vendor Shield applications. Along with Vendor Café and Vendor Shield, HABD will use Yardi MarketPlace to improve supply purchasing for all departments.

Yardi MarketPlace - (allows HABD to shop online in Yardi's Procure to Pay, faster purchase process) – Vendors that will be available in MarketPlace are Lowes, HD Supply, Office Depot, Sherwin Williams, GE Appliances, Grainger, Staples, Ferguson Enterprises, and more to come.

Vendor Shield - (allows Vendors to register and become a Vendor online) – both new and existing vendors can upload the required documents and have verification checks performed to ensure these documents are correct and in compliance with HABD vendor requirements.

Vender Café - (allows Vendors to submit invoices for payment and check payment status online)

IT is assisting Finance and Human Resources in completing the migration from AccountMate and LightWork Time to ADP Payroll Services. AccountMate and LightWork Time are two separate applications utilized by Finance and HR to process and manage all existing and past employees' pay and pay records. ADP Payroll Services will streamline the HABD payroll process by combining multiple processes into one application. ADP will provide an easy-to-navigate online interface compatible with all devices for employees to view their records.

IT is preparing a scope of work for an RFP to implement an Electronic Document Management System (EDMS) technology to improve the efficiency of processes in all departments. Specifically, HABD IT is evaluating imaging technologies, electronic document management technologies (e.g., email, attachments, Microsoft Word files, Microsoft Excel spreadsheets, Microsoft PowerPoint presentations, etc.), and integrated workflow technologies to enable the various departments to accomplish several objectives:

- a. Recapture physical space that primarily holds physical originals of documents generated or received by HABD. Many of these original documents are currently filed as hard copies in folders on shelves, in folders in filing cabinets, or in boxes in off-site storage facilities.
- b. Reduce the number of paper documents that are duplicated throughout the agency.
- c. Reduce liabilities through effective management of multiple types of documents (scanned

or electronically generated), and improving the tracking, retrieval, retention, and final disposition of these documents. Examples include the reduction in the “loss” of documents and files that are incorrectly lost due to errors in retention and the effective destruction of documents that are no longer required to be stored or archived.

IT will continue assessing/updating data processing systems, data security, and network/voice infrastructure to support future growth. For example, items such as; applications, servers, computers, 2FA, firewall, network switches, routers, fiber connections, and VoIP.

Human Resources

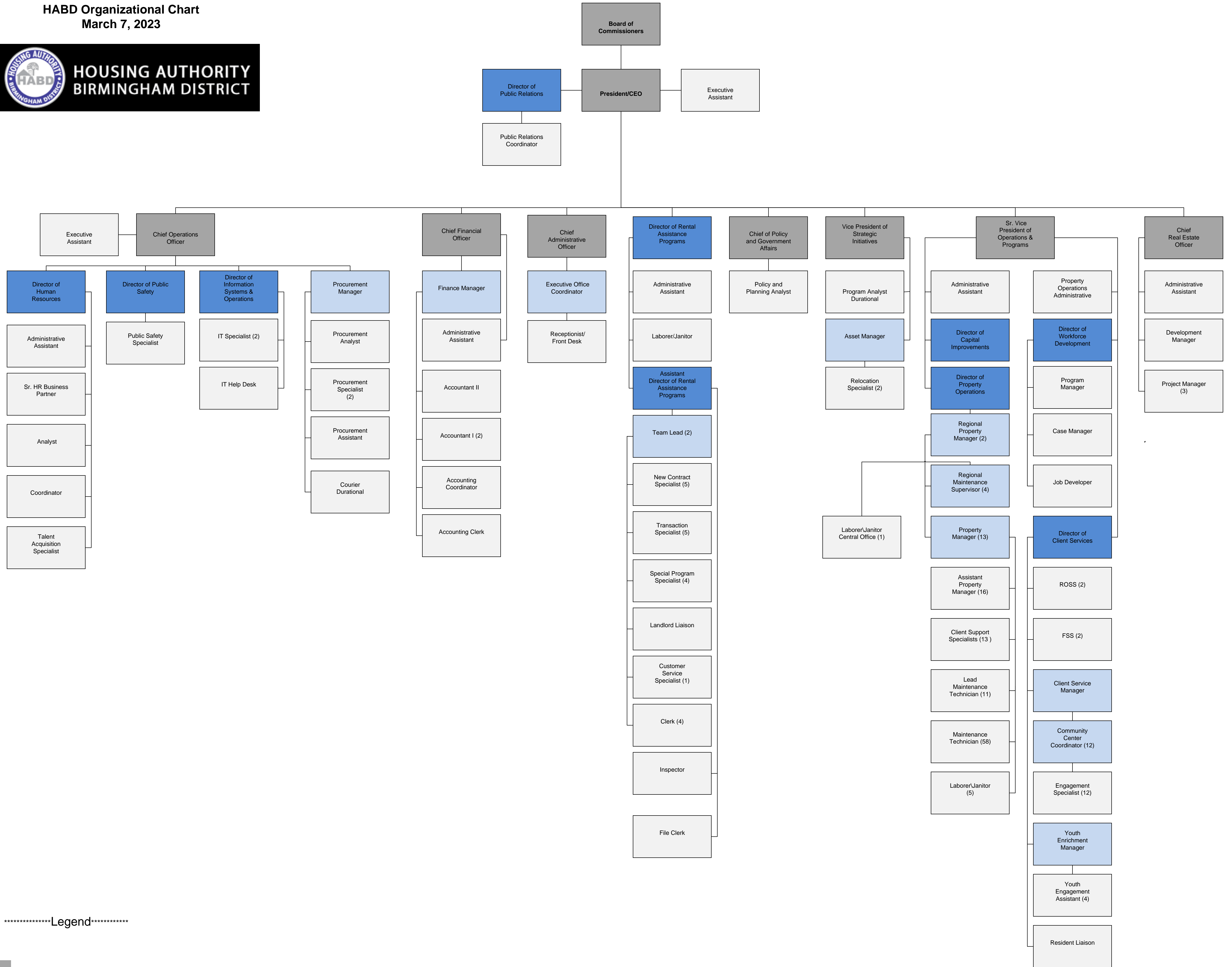
The following major changes were implemented by HABD’s Human Resources department in the past year.

July 2022 employee pay structure was changed to 26 pay periods within a calendar year. In November 2022, the benefit for tuition reimbursement was increased from \$2,500 to \$5,000 a year to encourage professional and educational development.

Attachment E: Operations and Management (Human Resources) Revised Organizational Chart



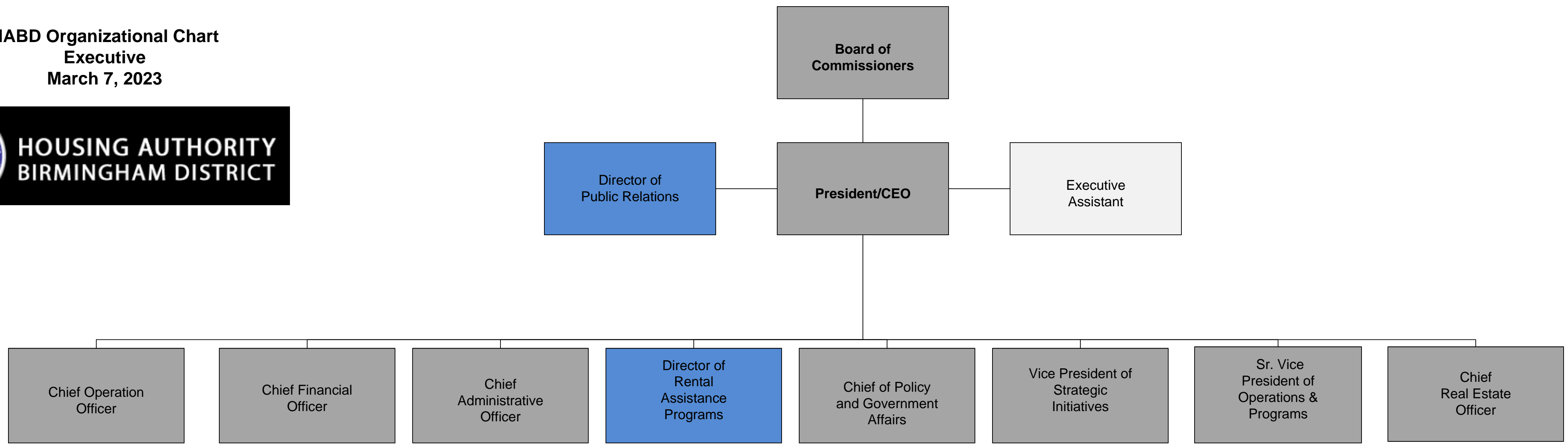
HABD Organizational Chart
March 7, 2023







*****Legend*****

- Chief and VPs
- Directors
- Managers, Supervisors
- Support Staff

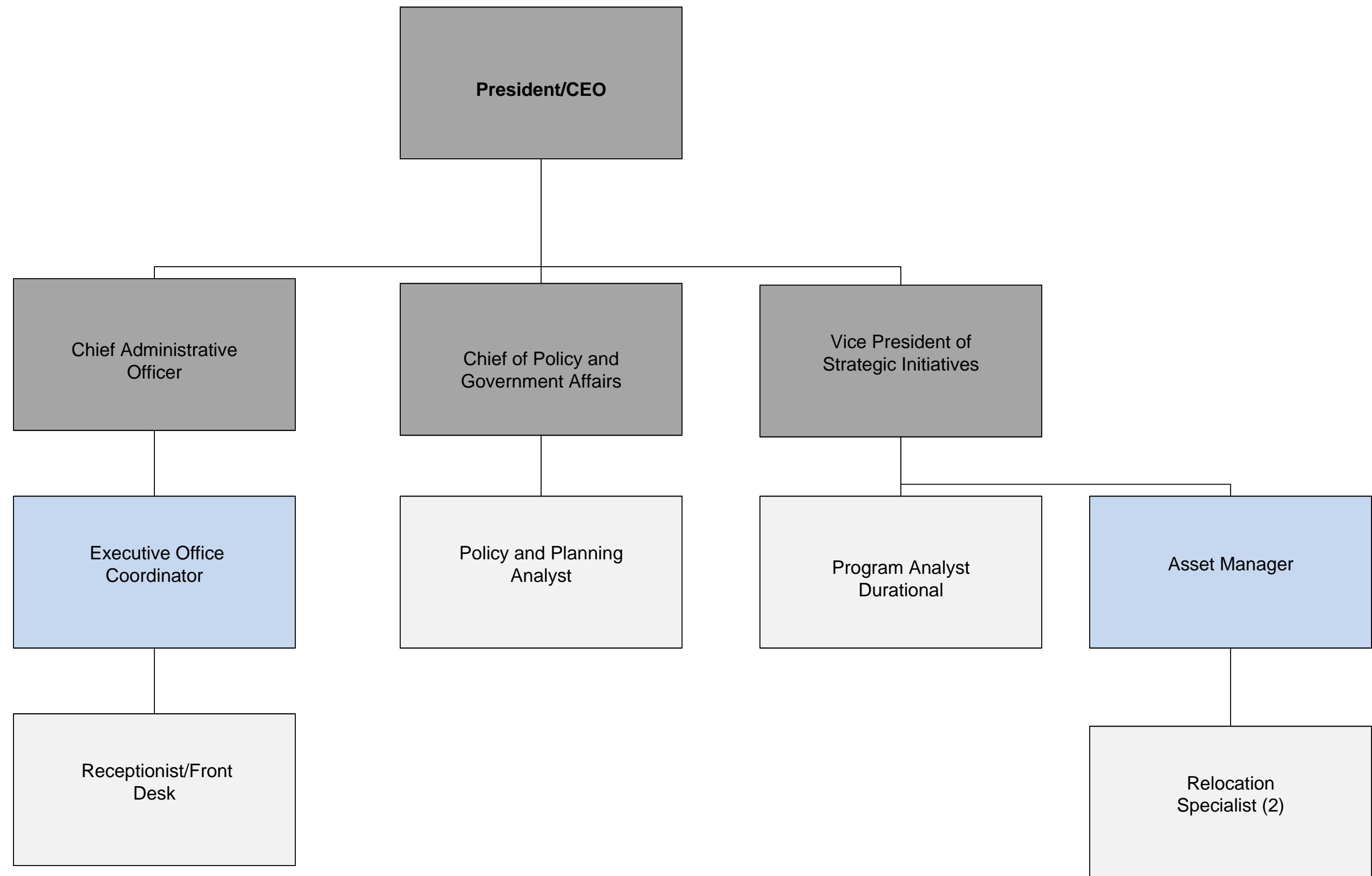
HABD Organizational Chart
Executive
March 7, 2023



.....Legend.....

-  Chief and VPs
-  Directors
-  Managers, Supervisors
-  Support Staff

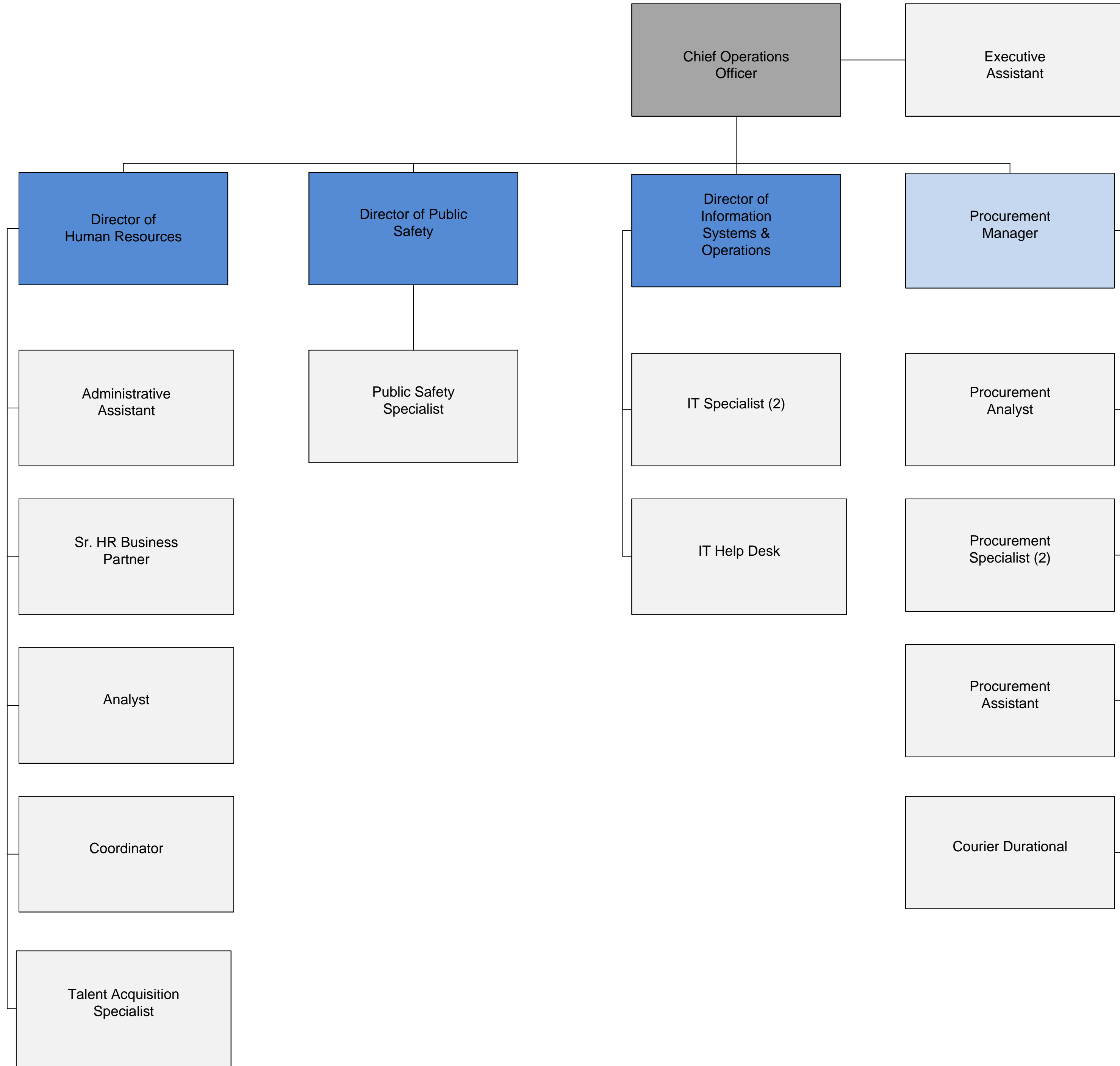
HABD Organizational Chart
Executive
March 7, 2023



.....Legend.....

- Chief and VPs
- Directors
- Managers, Supervisors
- Support Staff

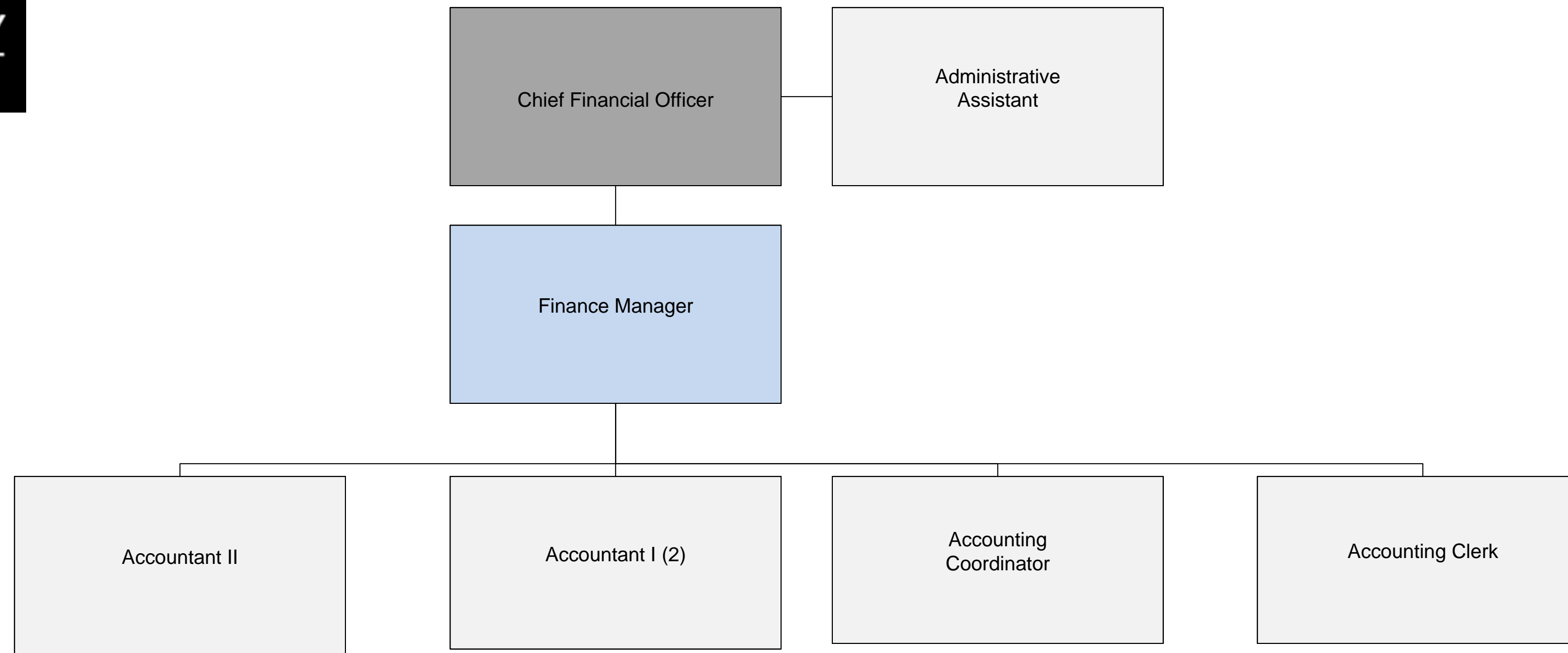
HABD Organizational Chart
 Human Resources, Public
 Safety, IT, Procurement
 March 7, 2023



.....Legend.....

- Chief and VPs
- Directors
- Managers, Supervisors
- Support Staff

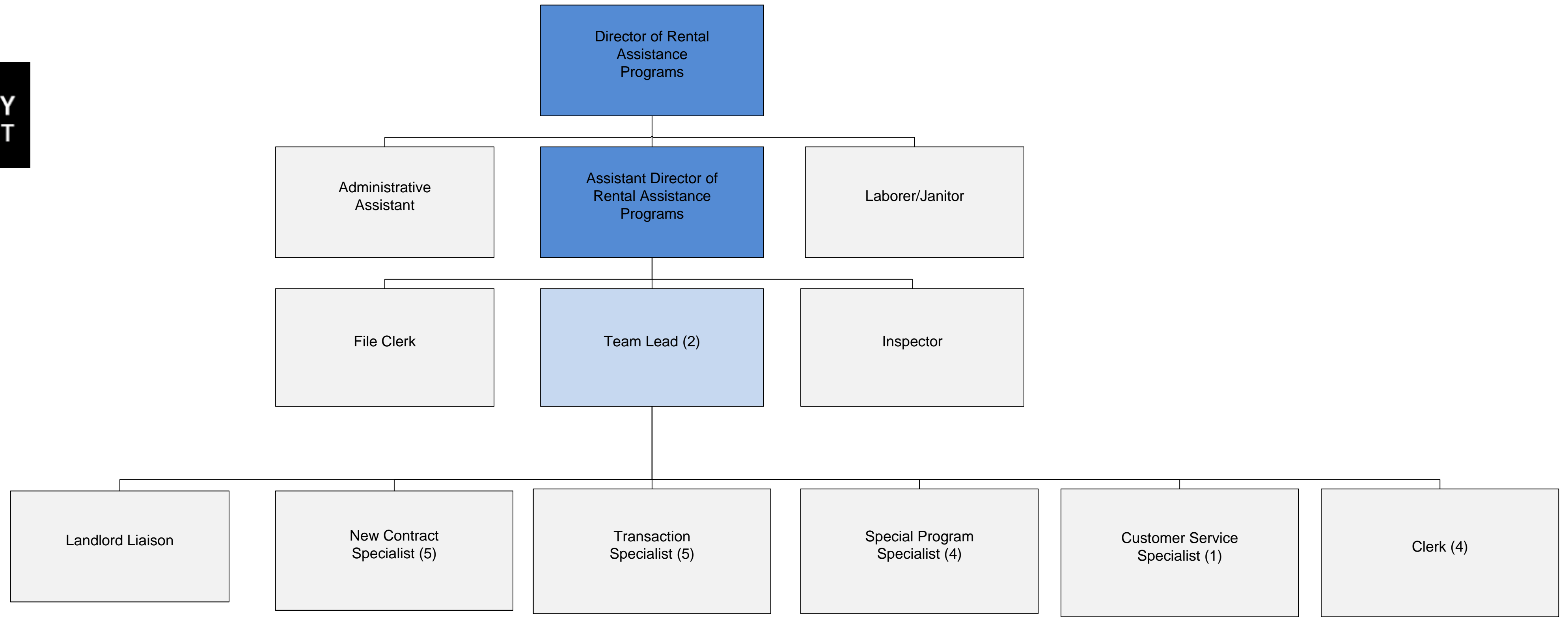
HABD Organizational Chart
Finance Department
March 7, 2023



.....Legend.....

- Chief and VPs
- Directors
- Managers, Supervisors
- Support Staff

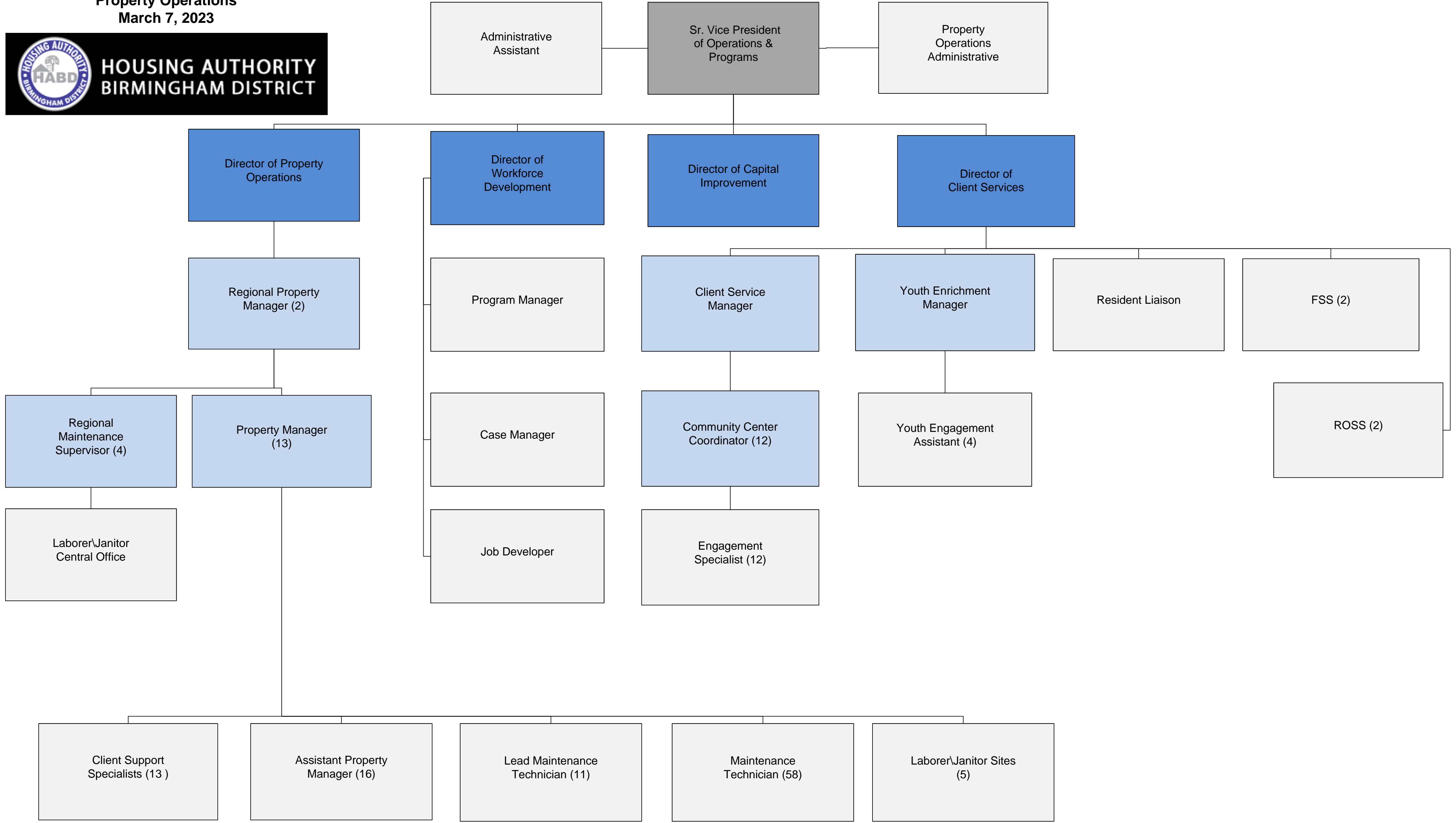
HABD Organizational Chart
Rental Assistance/Sec. 8
March 7, 2023



.....Legend.....

- Chief and VPs
- Directors
- Managers, Supervisors
- Support Staff

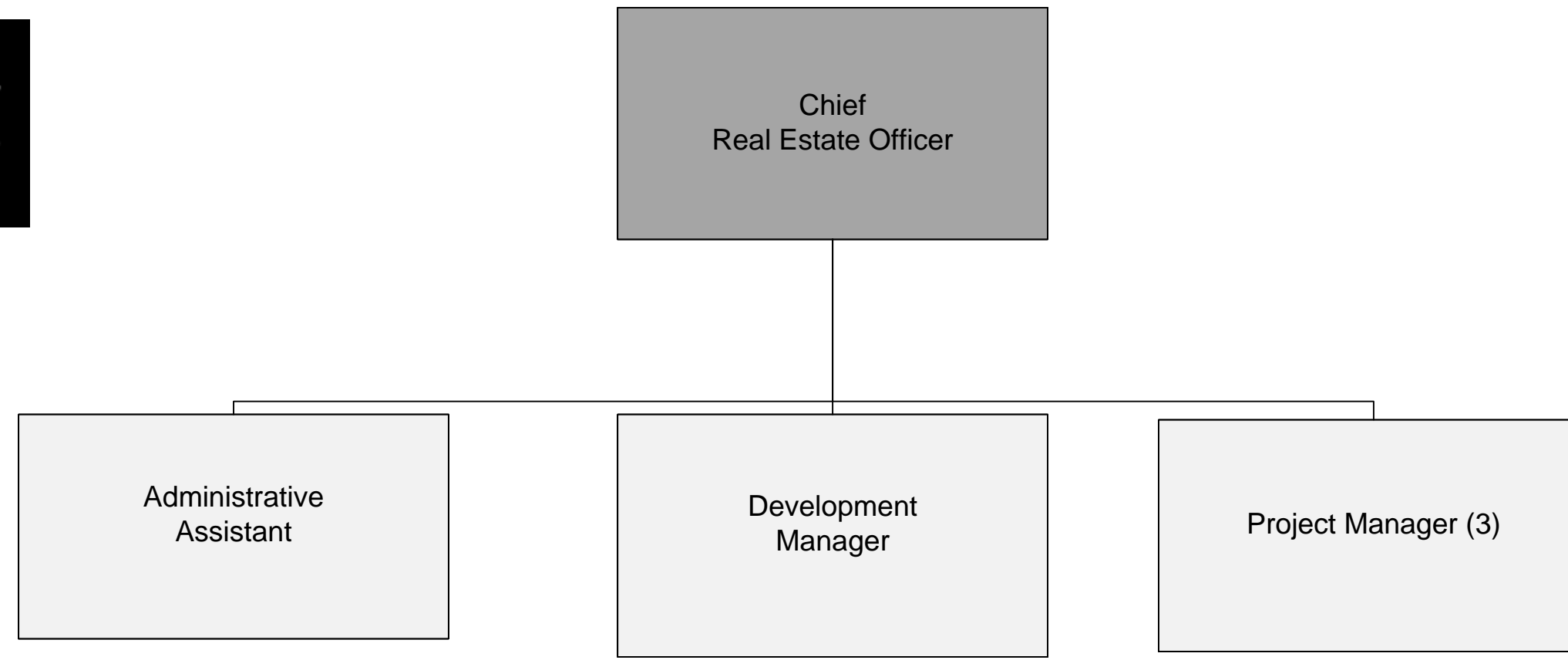
HABD Organizational Chart
Property Operations
March 7, 2023



*****Legend*****

- Chief and VPs
- Directors
- Managers, Supervisors
- Support Staff

HABD Organizational Chart
Real Estate Development
March 7, 2023



.....Legend.....

- Chief and VPs
- Directors
- Managers, Supervisors
- Support Staff

Attachment F Grievance Procedures



ATTACHMENT F: GRIEVANCE PROCEDURES

HABD's Grievance Procedures are contained in the ACOP and Administrative Plan and have not been revised.

Attachment G

Homeownership Program



ATTACHMENT G: HOMEOWNERSHIP

Homeownership Program

Overview

HABD is in the process of rebuilding our agency's capacity to transition families from a rental unit to a path to homeownership. HABD has public housing units in the Fountain Heights, Mason City, and Tuxedo (Ensley) communities of Birmingham that are currently in use by tenants, some of which are interested in purchasing the unit they live in. HABD's Homeownership program is based on a 5(h) Homeownership Program with the purpose of providing affordable home ownership opportunities for working class families. The program currently has an inventory of thirty-five (35) units to repurpose into homeownership.

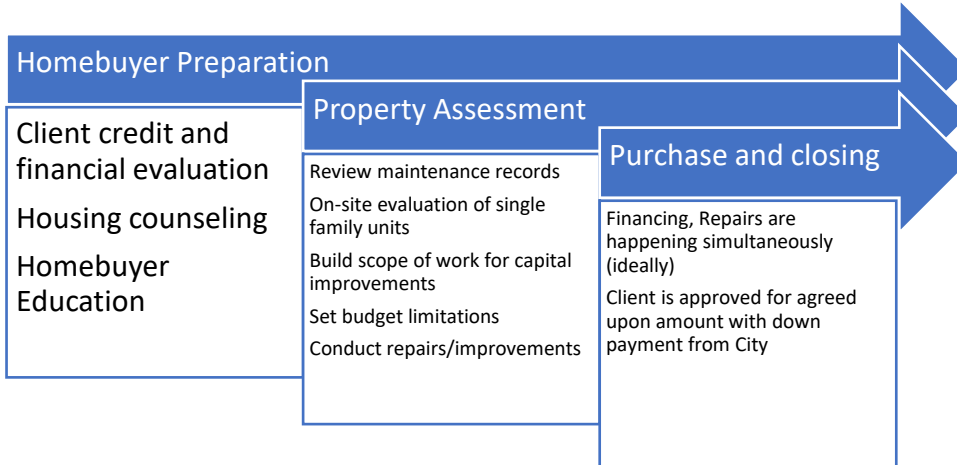
HABD is engaged with local housing counseling agencies to begin the process of getting our program participants "mortgage ready." This is accomplished by engagement with our HUD-approved counseling partner agencies such as Neighborhood Housing Services of Birmingham, Birmingham Urban League, and Operation HOPE to provide a qualifying First Time Homebuyer Class (8 hours) and individual counseling of the residents. HABD has also re-engaged with local lenders who participate with HABD homeownership efforts such as the HCV Homeownership program to ensure that potential homeowners have the needed financing to make the purchase. HABD is also engaged with the Department of Community Development for the City of Birmingham to ensure our clients/residents have access to down payment assistance programs that can assist with the sustainability of their home purchase.

Supporting Activities:

Building upon success of clients served under the 5(h) program, HABD intends to recruit, identify and hire the requisite staffing to conduct the following activities related to the 5(h) Homeownership Program:

- i. Engage current tenants/residents on level of interest to purchase the unit they currently live in.
- ii. Continue to engage with HUD-Approved counseling agencies to prepare our residents for the transition to homeownership.
- iii. Build scopes of work for any necessary renovations to units where the resident is mortgage-ready and prepared to purchase the unit they occupy. Once that work is conducted, an updated appraisal will be obtained.

A diagram of the process is outlined on the next page:



The HABD team is committed to creating 10 at minimum this year, which will repurpose one third of the existing inventory HABD currently has and potentially spur development of additional units (scaled development and/or infill). To accomplish this, HABD will recruit the requisite personnel to oversee these activities, manage the progress of the clients, work closely with partners inside HABD and externally to ensure that our residents who have a demonstrated interest in homeownership can achieve their goal of homeownership.

Inventory and Capital Improvements:

HABD staff have identified five (5) families that are currently occupying units and are interested in homeownership. Through our partnerships with our HUD-approved counseling agencies and local lenders, the residents at the addresses below are on their way to have capital improvements made, are becoming mortgage ready, and are on track to purchase under the agency’s 5(h) plan. Below is a breakout of the occupied units for purchase, vacant units that will be updated and put on the market for sale, and a comprehensive list of the units HABD has in its inventory for homeownership opportunities for our residents and qualifying families.

Occupied Units for Purchase	
Address	Notes
2047 Avenue O Ensley	
1617 21 st Street Ensley	
2049 Avenue O Ensley	
1529 17 th Street N	Approved with local lender
2046 Avenue P Ensley	

Vacant Single Family Units	
Address	Property Site
1316 21 st Street Ensley	Tuxedo
2049 Avenue P Ensley	Tuxedo
1612 21 st Street Ensley	Tuxedo
1608 Avenue D Ensley	Tuxedo
1309 15 th Court N	Fountain Heights
1913 16 th Street SW	Mason City
1912 15 th Way SW	Mason City
1801 15 th Street SW	Mason City
1916 15 th Way SW	Mason City

Number of Single Family Units	
Location	AMP#
1812 14 th Way SW Birmingham	AL001000040
1816 14 th Way SW Birmingham	AL001000040
1820 14 th Way SW Birmingham	AL001000040
1921 15 th Street SW Birmingham	AL001000040
1913 16 th Street SW Birmingham	AL001000040
1312 15 th Ave N Birmingham	AL001000040
1801 15th Street SW, Birmingham, AL	AL001000042
1916 15th Way SW, Birmingham, AL	AL001000042
1917 16th Street SW, Birmingham, AL	AL001000042
1912 15th Way SW, Birmingham, AL	AL001000042
1309 15th Court N, Birmingham, AL	AL001000042
1512 21 st Street Ensley	AL001000044
1516 21 st Street Ensley	AL001000044
2044 Avenue P	AL001000044
2046 Avenue P	AL001000044
2048 Avenue P	AL001000044
2045 Avenue P	AL001000044
2047 Avenue P	AL001000044
2049 Avenue P	AL001000044
1613 21 st Street Ensley	AL001000045
1617 21 st Street Ensley	AL001000045
1612 21 st Street Ensley	AL001000045
1616 21 st Street Ensley	AL001000045
1612 22 nd Street Ensley	AL001000045
1616 22 nd Street Ensley	AL001000045
2044 Ave O Ensley	AL001000046
2045 Ave O Ensley	AL001000046
2046 Ave O Ensley	AL001000046
2047 Ave O Ensley	AL001000046
2048 Ave O Ensley	AL001000046
2049 Ave O Ensley	AL001000046
1608 Ave D Ensley	AL001000046
2049 Ave O Ensley	AL001000046
1608 Ave D Ensley	AL001000046

Attachment H

Revised Community Service and Self Sufficiency Programs



ATTACHMENT H: COMMUNITY SERVICE AND SELF-SUFFICIENCY PROGRAMS

Statement of Public Housing Community Service

Community service must be performed by every non-exempt resident, consistent with the requirements of this policy. Community service is the performance of voluntary work or duties that are a public benefit, and that serve to improve the quality of life, enhance resident self-sufficiency, or increase resident self-responsibility in the community. Community service does not include political activities.

Each non-exempt, adult (18 years or older) public housing resident, for and during each month of occupancy, must:

- a. Contribute eight hours of community service; or
- b. Participate in a self-sufficiency program for eight hours; or
- c. Perform eight hours of combined activities as described in items one and two.

Exemption is required for an adult who:

- a. Is 62 years of age or older; or
- b. Qualifies with disabilities that prevent the individual's compliance. The individual must provide appropriate documentation to support the qualifying disability, which may include self-certification; or is the primary caretaker of such individual is exempt; or
- c. Is engaged in work activities as defined in section 407(d) of the Social Security Act;
- d. Is participating at least eight hours a month in a welfare-to-work program; or
- e. Is a member of a family receiving assistance from and in compliance with a State program funded under Part A, Title IV of the Social Security Act; or
- f. Currently working at least 20 hours per week.

Proof of Compliance and Enforcement

Each head of household must present to the HABD property management office, for the site of residence, documentation that all persons, eighteen years of age or older living in the household, who are not exempt, have complied with this section.

Documentation may include a letter from the agency on letterhead or another official document. Any such documentation shall be verifiable by the HABD. Failure to comply with the Community Service Requirement and to provide appropriate verifiable documentation prior to the date required shall result in the lease not being renewed by the HABD. HABD may allow the family member who is not in compliance to complete the requirements within the following year as follows:

- a. The head of household and the person not in compliance shall sign an agreement stating that the deficiency will be cured within the next twelve months.
- b. The head of household annually at re-certification shall make proof of compliance with the agreement.
- c. Failure to comply with the agreement shall result in the lease being terminated for such non-compliance, unless the person(s) other than the head of household no longer resides in the unit and has been removed from the lease.

Services and Programs			
Program Name & Description (including location, if appropriate)	Application Method Waiting List Random Selection Specific Criteria	Access (development office/PHA Rental Office)	Eligibility (public housing or HCV participants or both)
FSS Section 8 Participant	Referrals	Site Office	Section 8
	Mail In		
	Electronic Database		
	Waiting List		
FSS Public Housing Participant	Mail In		Public Housing
	Electronic Database		RAD Conversion
	Waiting List		

1. FSS Programs

FSS Participation		
Program	Required Number of Participants	Actual Number of Participants (As of 03/08/2023)
Public Housing	50	71
HCV	50	83

Attachment H: Family Self Sufficiency (FSS) Revised Action Plan

Accepted by HUD on September 19, 2022



FSS Program Action Plan:

The Family Self-Sufficiency (FSS) Program of the Housing Authority of the Birmingham District (HABD) is committed to providing the highest quality of housing and related services to the FSS Program participants. In an effort to encourage residents to reach their fullest potential and become self-sufficient, the HABD will collaborate with community supportive services that provide education, job training, etc., with housing assistance for residents through the FSS Program.

The FSS Program was developed by the U.S. Department of Housing and Urban Development (HUD), and is a voluntary program designed to encourage Public Housing (PH) and Housing Choice Voucher (HCV) residents while they are advancing their education, job skills, and/or employment.

The FSS Program serves as a catalyst for families to accept responsibility for themselves as they move toward achieving economic independence and self-sufficiency through advancing their education and employment. The HABD FSS Program is implemented by the PH and HCV FSS Coordinator under the supervision of the Senior Director of Property Operations and Client Services.

GOALS

The HABD goal is to develop and implement a successful FSS Program for residents of PH and HCV Programs. The program will prepare families to become self-sufficient by providing them with educational opportunities, development and/or enhancement of job skills, job placement, homeownership counseling, and other related supportive services.

The HABD will implement its goal with the following aims:

Goal 1: Maintain the participation rate in the FSS Program to at least 100% annually, per coordinator.

Goal 2: 100% of FSS Participants will obtain and maintain stable employment

Goal 3: Increase the number of the FSS Participants with Escrow Accounts annually

Goal 4: To continue to host the annual George A. Pegues Memorial FSS Golf Tournament fundraiser.

Goal 5: To sponsor an annual Employment and Resource Fair in an effort to increase the number of working families participating in the program

Goal 6: To assist all FSS participants in completion of the program through case management.

GOALS

The HABD goal is to develop and implement a successful FSS Program for residents of PH and HCV Programs. The program will prepare families to become self-sufficient by providing them with educational opportunities, development and/or enhancement of job skills, job placement, homeownership counseling, and other related supportive services.

The HABD will implement its goal with the following aims:

Goal 1: Maintain the participation rate in the FSS Program to at least 100% annually, per coordinator.

Goal 2: 100% of FSS Participants will obtain and maintain stable employment

Goal 3: Increase the number of the FSS Participants with Escrow Accounts annually

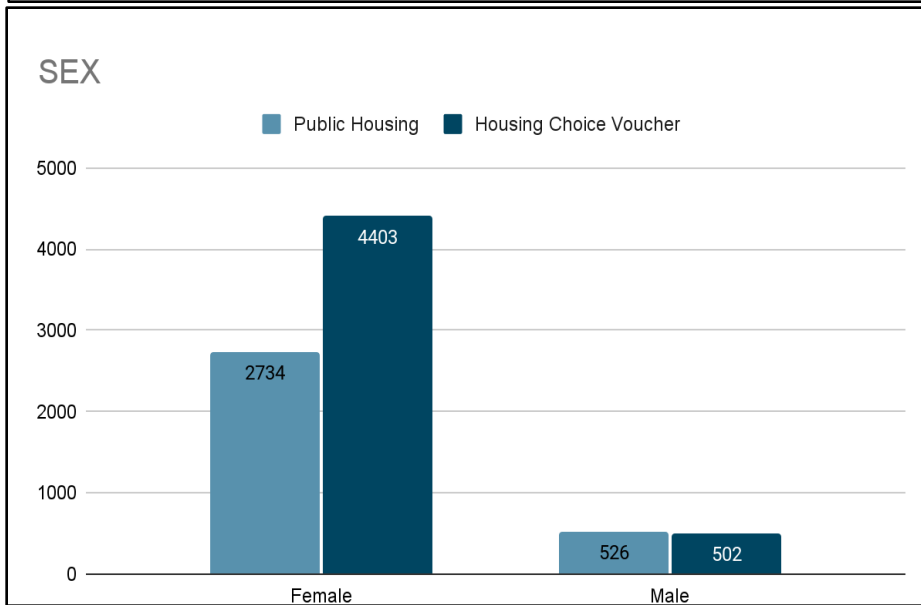
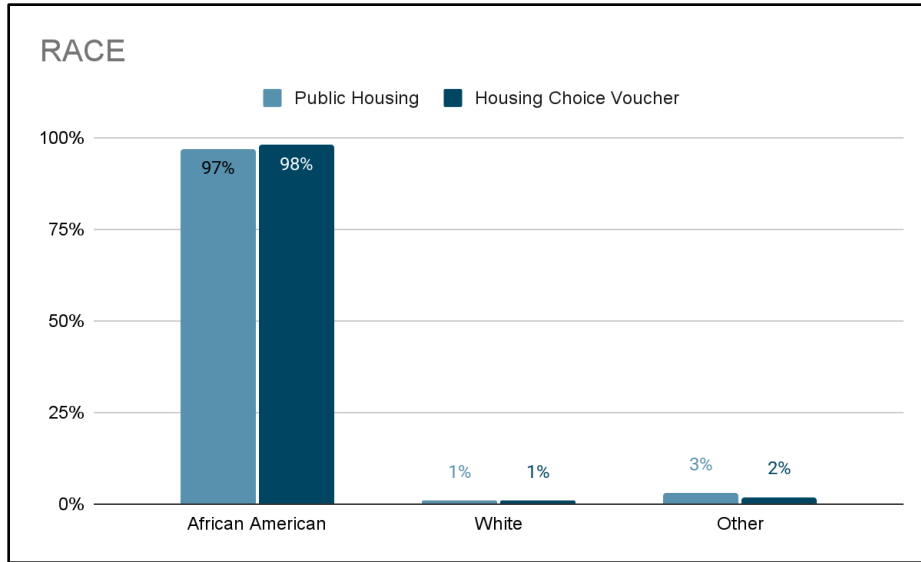
Goal 4: To continue to host the annual George A. Pegues Memorial FSS Golf Tournament fundraiser.

Goal 5: To sponsor an annual Employment and Resource Fair in an effort to increase the number of working families participating in the program

Goal 6: To assist all FSS participants in completion of the program through case management.

FAMILY DEMOGRAPHICS

The HABD uses its public and assisted housing family demographics to identify supportive service needs for the families expecting to participate in the FSS Program. The HABD FSS Program will reflect the Agency's public and assisted housing population. The population breakdown is approximately 97% African American (Public Housing); 98% African American (HCV); 1% White (Both Public Housing and HCV) and 2% other racial groups. Most participants will be female heads of households with or without children. **HABD will serve 100 families, fifty (50) Public Housing and fifty (50) Housing Choice Voucher.**



SUPPORTIVE SERVICES TO BE OFFERED FOR PARTICIPANTS

The HABD’s FSS Program, through its partners on the Program Coordinating Committee, will provide the following activities and support services to FSS families:

Support Service General	Support Service Specific	Source/Partner
Child Care	Day Care Afterschool Care Homework Assistance Mentoring Services	Childcare Resources Big Brother/Big Sister

Transportation	Bus/Buss Passes Lyft Assistance	Max Transit Authority Jeff. Co. Family Resource Center Lyft
Education	GED Preparation Dropout Recovery Program Post-Secondary Education	Birmingham City Schools Jefferson State Community College Lawson State Community College Maranathan Academy UAB Educational Opportunity Center
Employment	Job Placement Resume Writing Interview Skills	Birmingham Career Center AIDT Snelling Personnel Staffing Personnel Board of Jefferson Co. Jefferson County DHR (JOBS)
Training	Job Readiness Training Skill Training	AIDT Innovate Birmingham Jefferson State Community College Lawson State Community College HABD Youthbuild
Health Care	Primary Care Mental Health Crisis Services Alcohol and Drug Prevention Alcohol and Drug Treatment	Crisis Center Impact Family Counseling AL Dept of Rehab Services ROSS United Health Care Cahaba Medical
Homeownership	Financial Literacy Credit Counseling Homeownership Counseling Debt Resolution IDA	Community Bank Neighborhood Housing Services United Way

FAMILY SELF-SUFFICIENCY PARTICPATION SELECTION

A waiting list will be maintained for families whose applications cannot be accepted at the time of initial application due to the program capacity limits. The waiting list will include the name, contact information for the head of household of the applicant family, and the date of their application.

The selection process for families participating in the FSS Program are as follows:

- The participant must currently be a Public Housing or Housing Choice Voucher HABD resident

- The individual terminated will not be eligible to apply for participation for a period of one year following termination. Upon the completion of the one year, and at the discretion of the HABD, the family may be eligible for re-enrollment and beginning a new Contract of Participation
- The participant must complete and submit an FSS Interest Form to the PH FSS Coordinator, HCV FSS Coordinator, or other HABD Staff
- The PH FSS Coordinator and/or HCV FSS Coordinator will review the FSS Interest Form and follow up with letter to schedule an individual appointment to complete the FSS Contract of Participation

A family's election not to participate in the FSS Program will not affect the terms of their current Public Housing or Housing Choice Voucher Lease Agreement.

FAMILY SELF-SUFFICIENCY NON-PREFERENCE

The FSS Program will maintain a database of all interested applicants. This database will serve for selection of applicants for future vacancies within the program. The HABD does not discriminate against applicants because of their race, gender, age, sexual orientation, religion, marital status, number of children, skills or developmental disabilities.

PARTICIPATION OUTREACH

The FSS Program will distribute information throughout all of the HABD Public Housing Communities and Section 8 Offices. The following efforts will be administered:

LOCATIONS	RESPONSIBLE PARTIES	METHODS (IN PERSON/VIRTUAL)
Briefings/Orientations	HABD Staff	Flyer Interest Forms
Interims/Recertifications	HABD Staff	Flyer Interest Forms
Transfers/Portability	HABD Staff	Flyer Interest Forms
Lobbies	HABD Staff	Flyer Interest Forms
Community Centers	HABD Staff	Flyer Interest Forms
Resident Council Meetings	FSS Coordinators	PowerPoint Presentation

LOCATIONS	RESPONSIBLE PARTIES	METHODS (IN PERSON/VIRTUAL)
		Flyer Interest Forms

After the prospective participant has been interviewed by the FSS Coordinator and accepted as a participant, the FSS Coordinator will work directly with him or her in preparing the Contract of Participation. This contract will specifically identify education, career and family goals, and set forth a timetable for achieving these goals within term of the contract.

For all case management functions, such as initial interviews, home visits, etc., the HABD PH and HCV FSS Coordinators will perform one-on-one assessments to determine the needs of the participating families. Based on these assessments, coordinators will deliver appropriate services.

INCENTIVES

One of the most important components that contributes to the success of the FSS Program is the motivation each participant demonstrates in order to complete the terms of the Contract of Participation. Therefore, all participants will be interviewed prior to being accepted into the program.

A. Escrow Account

The HABD will establish and deposit funds to individual FSS escrow accounts for FSS participants in accordance with HUD regulations as outlined in the Code of Federal Regulations, Section 984.305.

B. Interim Disbursements

Families may request an interim disbursement from the escrow account once the FSS family has fulfilled at least one interim goal, in order to pay for specific goods or services that will help the family make progress toward achieving the goals in the Individual Training and Services Plan (ITSP). Requests must be in writing in the participants own words.

C. Training, Education, and Workshops

Through the PCC and other forums, the HABD FSS Program will connect the FSS participants with job training, educational, and social service agencies to provide the supportive services necessary to develop self-sufficiency. In addition, FSS families will be provided on local homeownership opportunities.

PROGRAM COORDINATING COMMITTEE (PCC)

The HABD has established and will maintain a Program Coordinating Committee (PCC) whose function will be to assist in securing commitments of public and private resources (supportive

services, jobs, etc.) for the operation of the program. The committee is composed of a cross section of community and business leaders and program participants. The PCC will assume an advisory role in the FSS Program and the HABD's FSS Coordinators will assume the leadership role. The PCC will meet on a quarterly basis to review and recommend, when needed, revision to the FSS Action Plan and assist with fundraising activities.

The PCC membership will include leadership from the following:

- Two (2) Public Housing (PH) FSS Program Participants
- Two (2) Housing Choice Voucher (HCV) FSS Program Participants
- Two (2) HABD Representatives (i.e., Community Center Coordinator or Property Manager)
- Snelling
- Family Guidance Center
- Impact Family Counseling
- Innovate Birmingham
- Lawson State Community College
- Salvation Army
- Dannon Project
- Neighborhood Housing Services
- Birmingham Urban League
- Family Resource Center
- United Way
- West Garden Home Care
- Jefferson County Department of Human Resources
- Community Care Development Network
- Max Jefferson County Transit Authority
- Personnel Board of Jefferson County

Representatives from any other public and private service providers and private business in accordance with [24CFR 984.202(b)(2)].

The PH residents, HCV residents, and HABD Representatives who serve on the PCC will serve for a term of one (1) year to allow the broadest representation of participants. These persons will be replaced by selecting new individuals to serve. The Program Coordinating Committee will continue to operate according to the HUD guidelines and the HABD FSS PCC Bylaws (See Appendix).

CONTRACT OF PARTICIPATION

All applicants selected for participation in the FSS Program will be required to sign a Contract of Participation. The HABD will use the contract format approved by HUD and will include an Individual Training and Service Plan (ITSP). The contract will include the family's annual income, earned income, and the family rent (tenant rent plus utility allowance) in effect as of the effective date of the contract.

A. Family Responsibilities

Family responsibilities under the Contract of Participation include, but are not limited to, the following requirements:

1) *Head of FSS Family must:*

- a. Seek and maintain suitable employment.
 - i. As defined in the FSS regulations (24 CFR 984.303(4)(iii)), a determination of what constitutes “suitable employment” for each family member with a goal of seeking and maintaining it will be made by the HABD, with the agreement of the affected participant, based on the skills, education, job training and receipt of other benefits of the family member and based on available job opportunities within the community.
- b. Complete the interim goals, final goals, and any other activities by the completion dates contained in each ITSP.

2) *All family members must:*

- a. Comply with the terms of the lease
- b. If receiving welfare assistance, become independent of welfare assistance by the end of the Contract term
- c. If participating in the HCV program, the family must comply with the family obligations under the HCV program and live in the jurisdiction of the PHA that enrolled the family in the FSS program at least 12 months from the effective date of this contract, unless the initial PHA has approved the family’s request to move outside its jurisdiction under portability.

B. Graduation from the FSS Program and Disbursement of Escrow

At the discretion of the PHA/owner, the PHA will disburse to the head of the FSS family the amount in the family’s FSS escrow account, less any amount owed to the PHA/owner (for unpaid rent or other outstanding debts), when the family is compliant with its lease, and:

- a. The PHA/owner determines that the family has completed the terms of the contract, including the terms of all ITSPs; and
- b. The head of FSS family certifies that no member of the FSS family is a recipient of welfare assistance.

C. Contract Extension

A participant in the FSS program may request, in writing, an extension of the contract if the family is unable to complete its goals within the term of the contract due to circumstances beyond the family’s control. The HABD may extend the term of the Contract of Participation, not to exceed two (2) years for a “good cause”.

“Good Cause” is defined by, but not limited to, the following :

- Short-term Illness of Head of FSS Family/Other: this includes illness of the contracted resident or other family member requiring the presence of the contracted resident. If the duration of the illness is more than thirty (30) days,

a review will be conducted to determine if the existing Contract of Participation should be terminated, with the possibility of later reinstatement

- Inadequate/Unavailable Childcare: if the problem is long-term or frequent, the HABD may recommend alternative childcare options through the local child care management agency
- Supportive Services Issues: this includes a breakdown for disruption in established support services, other than child care or transportation, with no ready access to an alternative service
- Conflicting Demands: this includes individuals who miss appointments or fail to attend an activity due to job interviews, court appearances, employment, or educational obligations during the time the activity occurs.
- Personal or Family Crisis: this includes any kind of crisis or household emergency that interferes with participation, such as the death of a family member, or other justifiable circumstance

D. Termination of the FSS Contract of Participation

a. Involuntary Termination

The HABD may involuntarily terminate a family from FSS under the following circumstances

- i. If the participant fails to meet their obligations under the Contract of Participation, the Individual Training and Services Plan and related documentation. Non-compliance includes:
 1. Missing scheduled meetings, failure to return phone calls, and/or maintain contact after written notification of non-compliance
 2. Failure to work on activities and/or goals set forth in the Individual Training and Services Plan, including employment activities
 3. Failure to complete activities and/or goals within the specified time frames; and/or
- ii. If the participant's housing assistance has been terminated

b. Voluntary Termination

- i. Participants may also be terminated for the FSS program under the following circumstances:
 1. Mutual consent of both parties; and/or
 2. The family's withdrawal from the program

The HABD must give a notice of termination to the head of the FSS family. The notice must state the reasons for the HABD decisions to terminate the contract.

E. Termination with Escrow Disbursement

In most cases, families whose FSS contracts are terminated will not be entitled to disbursement of their accrued FSS escrowed funds. However, the Contract will be terminated with FSS disbursement when one of the following situations occur:

- a. Services that the HABD and the FSS family have agreed are integral to the FSS family's advancement towards self-sufficiency are unavailable

- b. The head of the FSS family becomes permanently disabled and unable to work during the period of the contract, unless the HABD and the FSS family.
- c. An FSS family in good standing moves outside of the jurisdiction of the PHA (in accordance with portability requirements at 24 CFR 982.353) for good cause, as determine by the PHA, and continuation of the Contract after the move, or completion of the Contract prior to the move, is not possible.

F. Modification

The HABD and the family may mutually agree to modify the Contract of Participation with respect to the ITSP and/or contract term, and/or designation of the head of FSS household. All modifications must be in writing and signed by the HABD as well as the Head of FSS Family. The HABD will allow for modifications to the Contract of Participation under the following circumstances:

- a. When the modifications to the ITSP improve the participant's ability to complete their obligations in the Contract or progress toward economic self-sufficiency
- b. When the designated head of the FSS family ceases to reside with other family member in the assisted unit, and the remaining family members, after consultation with the HABD, designate another family member to be the FSS head of family
- c. When a relocating family is entering the FSS program of a receiving PHA and the start date of the Contract must be changed to reflect the date the new Contract is signed with the receiving PGA

G. Compliance

Each participant is expected to maintain compliance with the Contract of Participation and to consistently progress toward their stated goals. Non-compliance is defined as the participant's refusal or neglect to consistently progress toward his/her goals or the refusal or neglect to accept employment.

The HABD and the FSS family agree to comply with HUD regulations and requirements, including 24 CFR parts 887 and 984. To the extent that anything in the contract conflicts with HUD regulations or requirements, including parts 887 and 984, HUD regulations and requirements will prevail. Terms and figures, such as baseline income and baseline rent, are subject to correction by the HABD for compliance with HUD regulations and requirements. The HABD must notify the family in writing of any adjustments made to the contract.

MEETINGS, SEMINARS, & WORKSHOP PARTICIPATION REQUIREMENT

Program participants are required to attend sponsored meetings, seminars, and/or workshops designed to assists the families in becoming self-sufficient. These educational opportunities will link available community resources to participants. Participants must attend a minimum of eight (8) workshops/seminars throughout the year. Topics will include, but are not limited to the following:

- Money Management
- Credit Repair
- Interviewing Techniques
- Career Development
- Homeownership

The HABD HCV and PH Family Self-Sufficiency Coordinators are assigned case management responsibilities for each participant. The FSS Program is under the direct supervision of the Senior Director of Property Operations and Client Services, who ensures the HCV and PH FSS Program components are in compliance with the HABD policies and procedures, as well as HUD regulations.

GRIEVANCES

Any participant of the FSS Program may protest a decision, especially when adverse action is taken by the PHA against a family, the PHA is required to provide a grievance hearing in the public housing program, or an information hearing in the housing choice voucher program (24 CFR 966 subpart B, CFR 982.554).

All requests for an information hearing must be received by the HABD Coordinator within fourteen (14) business days of the date of the FSS termination letter. If a hearing is requested by the FSS family, notification to the family regarding the date, time, and location of the information hearing will be made by mail.

Persons included in the informal hearing shall include, but not limited to:

- The FSS head of household;
- The FSS Coordinator; and
- HABD staff members, other than FSS program staff, serving as the Hearing Officer

The family may request to reschedule a hearing for good cause, or if it is needed as reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety, or welfare of the family. Requests to reschedule a hearing must be made in writing within five (5) days prior to the hearing date.

Adverse actions taken within the FSS program include:

- Denial of admission into the FSS program
- Denial of request for supportive services
- Denial of request to change the ITSP
- Denial of request to change the Head of Household
- Denial of request for interim disbursement of the escrow account
- Denial of request to complete the Contract
- Denial of a request for an extension
- Denial of request for final disbursement of the escrow account or any portion thereof
- Withholding of the support services
- Termination of the FSS Contract

VERIFICATION OF FAMILY CERTIFICATION

Before final disbursement of the FSS Escrow funds to the family, the HABD may verify that the FSS family is no longer a recipient of TANF, by requesting copies of any documents which may indicate whether the family is receiving any TANF, and/or contact the Jefferson County Department of Human Resources.

REPORTING

The HABD will submit a report to HUD regarding the FSS Program as required by the HUD Code of Federal Regulations (Title 24, Section 984.401). The report will include the following information:

- A description of the activities carried out under the program
- A description of the effectiveness of the program in assisting families to achieve economic independence and self-sufficiency
- A description of the effectiveness of the program in coordination of resources within the local community to assist families to achieve economic independence and self-sufficiency
- Any recommendation by the HABD on the appropriate local Program Coordinating Committee for legislative or administrative action that would improve the FSS program and ensure the effectiveness of the program

GENERAL ASSISTANCE ACCOUNT

The Family Self-Sufficiency Program is designed to assist the HABD participants in becoming economically independent. However, from time to time, many families face situations where they may need financial support to help them in an emergency. The General Assistance Account has been established to assist participants who may encounter unforeseen emergencies such as car repairs, transportation assistance (bus passes) and childcare assistance. The FSS Program is supported by the Annual George A. Pegues Memorial FSS Golf Tournament. Funding to cover the individual needs of the program is an important component of the program.

The following guidelines have been established to ensure the continuation of funds available from this account:

- Submission of the General Assistance Application
- Only one (1) request per year and not to exceed \$400
- Resident has twelve (12) months to repay half of the borrowed amount.
- Requests for funds must be directly related to the goals of the family, as stated in the FSS Contract of Participation or unforeseen circumstances.
- Original invoices for the usage of the funds must be submitted to the coordinator at the time of the request

- Approval for funds is based on the sole discretion of HABD and availability of funds. Requests for fund approval must be reviewed and approved by the Senior Director of Housing Operations and Client Services.

FORFEITED ESCROW FUNDS

FSS escrow account funds forfeited by the FSS family (if any) will be used to support FSS participants in good standing. Upon written request from a family, the FSS Coordinator will consider the available funds and make a determination. The HABD may also initiate a request for the use of forfeited escrow funds.

At the discretion of the FSS Coordinator, and approval from the Senior Director of Housing Operations and Client Services, forfeited escrow funds may be considered in lieu of an interim escrow disbursement.

Forfeited FSS escrow funds may be deployed within ninety (90) days of the Contract of Participation execution. Use of forfeited escrow funds for eligible uses (described below) may be requested by the HABD and the head of the FSS family. Funds distributed to the FSS family are not required to be repaid to the Forfeited FSS escrow account.

Eligible uses of forfeited escrow include, but are not limited to:

- Transportation
- Child Care
- Employment or Educational Costs, including:
 - Employment Training
 - Employment Preparation (e.g., interview training, professional clothing, etc.)
- Education Costs (books, fees, uniforms, tools, etc.)
- Training for FSS Program Staff

DEFINITIONS (24 CFR 984.103)

The definitions below are specified in CFR 24 984.103. The terms 1937 Act, Fair Market Rent, Head of Household, HUD, Public Housing, Public Housing Agency (PHA), Secretary, and Section 8, as used in this part, are defined in 24 CFR Part 5.

Certification means a written assertion based on supporting evidence, provided by the FSS family or the HABD, as may be required under this part, and which:

- Shall be maintained by the HABD in the case of the family's certification, or by HUD in the case of the PHA's or owner's certification;
- Shall be made available for inspection by HUD, the HABD, and the public, as appropriate; and,
- Shall be deemed to be accurate for purposes of this part, unless the Secretary or the HABD, as applicable, determines otherwise after inspecting the evidence and providing due notice and opportunity for comment

Contract of Participation (COP) means – a contract, in a form with contents approved by HUD, entered into between an FSS family and the HABD operating an FSS Program that sets forth the

terms and conditions governing participation in the FSS Program. The Contract includes all Individual Training and Services Plans (ITSPs) entered into between the HABD and all members of the family who will participate in the FSS Program, and which plans are attached to the Contract as exhibits. For additional detail see 984.303.

Effective Date of Contract of Participation (CoP) – means the first day of the month following the date in which the FSS family and the PHA entered into the CoP

Eligible Families means current resident of Public Housing (Section 9) and current Section 8 program participants, as defined in this section, including those participating in other local self-sufficiency programs.

Enrollment means the date that the FSS family entered into the CoP with the HABD

Family Self-Sufficiency (FSS) Program means the program established by a PHA within its jurisdiction or by an owner to promote self-sufficiency among participating families, including the coordination of supportive services to the families, as authorized by section 23 of the 1937 Act

FSS Escrow Account (or, escrow) means the FSS escrow account authorized by section 23 of the 1937 Act, and as provided by 984.305.

FSS Escrow Credit means the amount credited by the HABD to the FSS family's FSS escrow account

FSS Family means a family that resides in Public Housing (Section 9) or receives Section 8 assistance or receives HUD Project-Based Rental Assistance for privately owned property, and that elects to participate in the FSS Program, and whose designated adult member (head of FSS family), as determined in accordance with 984.303(a), has signed the CoP

FSS Family in Good Standing means, for purposes of this part, an FSS family that is in compliance with their FSS CoP; has either satisfied or are current on any debts owed the HABD; and is in compliance with the regulations regarding participation in the relevant rental assistance program

FSS Related Service Program means any program, publicly or privately sponsored, that offers the kinds of supportive services described in the definition of "supportive services" set forth in this 984.103

FSS Slots refers to the total number of families (as determined in the Action Plan and, for mandatory programs, in 984.105 of this part) that the PHA will serve in its FSS Program

FSS Program Coordinator means the person(s) who runs the FSS program. This may include (but is not limited to) performing outreach, recruitment, and retention of FSS Participants; goal setting and case management/coaching of FSS participants; working with the community and service partners; and tracking program performance

FY means Federal Fiscal Year (starting October 1 and ending September 30, and year designated by the calendar year in which it ends)

Head of FSS Family means the designated adult family member of the FSS family who has signed the CoP. The head of FSS family may, but is not required to be, the head of the household for purposes of determining income eligibility and rent

Individual Training and Services Plan (ITSP) means a written plan that is prepared by the HABD in consultation with a participating FSS family member (the person with, for, and whom the ITSP is being developed), and which sets forth:

- The final and interim goals for the participating FSS family member;
- The supportive services to be provided to the participating FSS family members;
- The activities to be completed by that family; and,
- The agreed upon completion dates for the goals and activities

Each ITSP must be signed by the HABD and the participating FSS family member, and is attached to, and incorporated as part of the CoP. An ITSP must be prepared for each adult family member who elects to participate in the FSS Program, including the head of FSS family who has signed the CoP

Owner means the owner of multifamily assisted housing

Self-sufficiency means that an FSS family is no longer receiving Section 8, Public Housing assistance, or any Federal, State, or local rent or homeownership subsidies or welfare assistance. Achievement of self-sufficiency, although an FSS program objective, is not a condition for receipt of the FSS escrow account funds

Supportive Services means those appropriate services that the HABD will coordinate on behalf of an FSS family under the CoP, which may include, but are not limited to:

- *Childcare* – childcare (on an as-needed or ongoing basis) of a type that provides sufficient hours of operation and serves an appropriate range of ages;
- *Transportation* – transportation necessary to enable of participating FSS family member to receive available services, or to commute to their place(s) of employment;
- *Education* – remedial education; education for completion of high school or attainment of a high school equivalency certificate; education in pursuit of a post-secondary degree or certificate;
- *Employment Supports* – job training, preparation, and counseling; job development and placement; and follow-up assistance after job placement and completion of the CoP;
- *Personal Welfare* – substance/alcohol abuse treatment and counseling, and health, dental, mental health insurance services;
- *Household Management* – training in household management;
- *Homeownership and Housing Counseling* – homeownership education and assistance and housing counseling;
- *Financial Empowerment* – training in financial literacy, such as financial coaching, training in financial management, asset building, and money management, including engaging in mainstream banking, reviewing and improving credit scores, etc.;

- *Other Services* – any other services and resources, including case management, optional services, and specialized services for individuals with disabilities, that are determined to be appropriate in assisting FSS families to achieve economic independence and self-sufficiency. Reasonable accommodations and modifications must be made for individuals with disabilities consistent with HUD requirements, including HUD’s legal obligation to make reasonable modifications under Section 504 of the Rehabilitation Act

Welfare Assistance means (for purposes of the FSS Program only) income assistance from Federal, (i.e. Temporary Assistance for Needy Families (TANF) or subsequent program) State, or local welfare program and includes only cash maintenance payments designed to meet a family’s ongoing basic needs. Welfare assistance does not include:

- Nonrecurrent, short-term benefits that:
 - Are designed to deal with a specific crisis or episode of need;
 - Are not intended to meet recurrent or ongoing needs; and,
 - Will not extend beyond four months
- Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);
- Supportive services such as childcare and transportation provided to families who are employed;
- Refundable earned income tax credits;
- Contributions to, and distributions from, Individual Development Accounts under Temporary Assistance for Needy Families (TANF)
- Services such as counseling, case management, peer support, childcare information and referral, financial empowerment, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support;
- Amounts solely directed to meeting housing expenses;
- Amounts for health care;
- Supplemental Nutrition Assistance Program and emergency rental and utilities assistance;
- Supplemental Security Income, Social Security Disability Income, or Social Security; and
- Child-only or non-needy TANF grants made to or on behalf of a dependent child solely on the basis of the child’s need and not on the need of the child’s current non-parental caretaker

Client Services

The HABD Client Services Department relies upon the Community Centers to be the central point for the HABD Triage Initiative. The Initiative is there to address the four HABD/HUD pillars for our residents which are: Economic Empowerment, Educational Advancement, Health and Wellness, and Character Development. The Community Centers will also continue to be a HUB for the community where programs, after-school activities, educational seminars, and athletic events will continue to take place.

The process for HABD residents in the Triage Initiative is as follows:

1. New residents are given the Triage Assessment Questionnaire during the orientation portion of their intake process and the answers are entered into our system, Tracking At A Glance system (TAAG), by the Community Engagement Staff.
2. The Community Coordinator/Case manager will set up the resident with the proper partner or partners to cover needs listed in the assessment. (*Education, Mental Health, Job Search, etc.*) and their progress will be tracked with the appropriate data being entered using the TAAG system.
3. During their yearly recertification the resident will fill out another Triage Assessment form to fill any needs/new issues that they have, they will then be directed to the appropriate partner to address their needs.

Some of the partners that are part of this process are:

Alethia House, Alabama Industrial Development (AIDT), Birmingham City Schools, Girls INC, The Boy Scouts of America, Premier Mental Health, The Dannon Project, The US Army, Lawson State Community College, Oaktree Ministries, Maranathan Academy, UAB, TC Counseling, Birmingham Healthy Start Plus, No More Martyrs, Project Hopewell, The Family Guidance Center of Alabama, DHR, and HUD.

Section 3 Program

HABD will continue to remain compliant with HUD Section 3 regulations and ensure that Section 3 opportunities are made available to residents of HABD. Section 3 will implement the following goals to ensure the investments of Section 3 resources and opportunities are directed towards our residents.

- Goal 1: To increase the Section 3 participation on all Section 3 covered projects by 2%
- Goal 2: To promote long-term employment opportunities for residents
- Goal 3: To help develop (2) Resident Owned Business (ROB) for contract award on upcoming
- Goal 4: To ensure Section 3 documented compliance is met on all Section 3 covered projects and activities.

Workforce Development

Workforce development is an essential component of community economic development in any economic climate. HABD'S Workforce Development department will implement the following goals to ensure the investments of economic opportunities and resources are directed towards our residents.

Goal 1: HABD will develop a Workforce Development Plan (WDP) which will include an assessment of the knowledge and skills of our residents linked to the anticipated knowledge and skills of the future workforce to best meet agency goals and objectives.

Goal 2: HABD and its partners will develop training programs that provide existing and potential workers with the skills to complete tasks needed by employers that will allow the organizations to stay competitive in a global marketplace.

Goal 3: Partner with the YouthBuild program to promote and ensure educational, workforce and life skills development

Goal 4: HABD will launch a Workforce Development Institute

The HABD Board of Commissioners approved a Revision to the Section 3 Policy on January 19, 2023 which is included in its entirety on the following pages.

Attachment H: Revised Section 3 Policy

Approved by HABD Board of Commissioners on January 19, 2023





Housing Authority of the Birmingham District

1826 3rd Avenue South, Birmingham, AL 35233
(O) 205.521.0614 - Website: <https://habd.org>

INTERNAL PROCEDURES, INSTRUCTIONS, AND FORMS

This packet is designed to comply with the New HUD Section 3 Final Rule issued September 29, 2020, and became effective November 30, 2020. Therefore, these documents and instructions are related to the “Hours Worked Benchmarks” as called for in the 24 CFR Part 75 regulation. Every contractor and sub-contractor (with the exception of professional services) are required to work toward meeting the prescribed benchmarks as indicated on the bottom of page 10 of this packet. There are no specific hiring or contracting goals under this new rule.

Most importantly, the rule does not require the hiring or contracting of any person or business that is not fully qualified to perform the work as would be charged. However, the rule makes clear that HUD is intent on ensuring Section 3 persons employed under the new rule receive measurable and sustainable employment. Therefore, Section 3 employees can be counted for up to five full years from the date of certification or hire respectively. HUD is expected to issue continued guidance on the new rule in the future so these documents may change in accordance with the rule.

IMPORTANT STATE LAW CONFLICT PER 24 CFR PART 75.9

Please note that due to that conflict with Alabama State Law HB225 - This act shall be known as the Clarke-Figures Equal Pay Act

This law directly shows a conflict with the requirement to confirm the income of potential Section 3 employees and prospective employees. To ask that information is a direct conflict with the law and thus HABD will not be able to work diligently toward.

If you should have any questions on this packet, please contact our Compliance Consultant:

Jacqueline R. French
Interim VP of Special Projects and Support Services/Section 3 Coordinator
Phone: 205.521.0614 - Cell: 205.329.0002 - Fax: 205.449.1221
jfrench@habd.net

Prepared January 4, 2023

Board Approved: _____

GOVERNING PARTS OF THE SECTION 3 FINAL RULE SPECIFIC TO THE
HOUSING AUTHORITY OF THE BIRMINGHAM DISTRICT

The Final Rule is at 24 CFR Part 75

Section 3 Background	3
✱ Internal Hiring Procedure	3
✱ Internal Contracting Procedure	4
✱ Internal Resident Training Procedure	4
Subpart A—General Provisions	
§ 75.1 Purpose	6
§ 75.3 Applicability	6
§ 75.5 Definitions	7
Subpart B—Additional Provisions for Public Housing Financial Assistance	
§ 75.9 Requirements.	9
§ 75.11 Targeted Section 3 worker for public housing financial assistance.	10
§ 75.13 Section 3 safe harbor.	10
§ 75.15 Reporting	10
§ 75.17 Contract provisions.	11
Subpart D—Provisions for Multiple Funding Sources, Recordkeeping, and Compliance	
§ 75.29 Multiple funding sources.	11
§ 75.31 Recordkeeping	12
✱ Benchmarks	12
✱ Termination and Cure	13
Contract and Solicitation Inclusion Package	Page
✱ New Requirements Summary	15
✱ Monthly Reporting Instructions	16
✱ Section 3 Business Self-Certification Forms	17
✱ Section 3 Individual Self-Certification Forms	18
✱ Hours Worked Reporting Form	19
✱ Acknowledgment and Affidavit Form	20

SECTION 3 BACKGROUND

Applicable to all expenditures and agreements regardless of the dollar amount

Background - Section 3 of the Housing and Urban Development Act of 1968 (Public Law 90-448, approved August 1, 1968) (Section 3) was enacted to bring economic opportunities generated by certain HUD financial assistance expenditures, to the greatest extent feasible, to low- and very low-income persons residing in communities where the financial assistance is expended. Section 3 recognizes that HUD funds are often one of the largest sources of Federal funds expended in low- and very low-income communities and, where such funds are spent on activities such as construction and rehabilitation of housing and other public facilities, the expenditure results in economic opportunities. By directing HUD-funded economic opportunities to residents and businesses in the community where the funds are expended, the expenditure can have the dual benefit of creating new or rehabilitated housing and other facilities while providing opportunities for employment and training for the residents of these communities.

The Section 3 statute establishes priorities for employment and contracting for public housing programs and for other programs that provide housing and community development assistance. For example, the prioritization as it relates to public housing assistance places an emphasis on public housing residents, in contrast to the prioritization as it relates to housing and community development assistance, which places more emphasis on residents of the neighborhood or service area in which the investment is being made.

INTERNAL PROCEDURES FOR IMPLEMENTATION OF THE RULE

Housing Authority of the Birmingham District **Internal Hiring** Procedure

The state of Alabama has a restriction on the use of prior salary or compensation information and the requesting of such information relating to employment. That law is referenced below and that language may cause or **create a conflict with the requirements of Section 3 to certify that a person that is hired is actually Section 3**, what category of Section 3 they are, or are not Section 3 at all. The Benchmarks (referenced on page 8 below) will be very difficult if not attain if the prior salary information is not available in all cases. Certainly, a more unreasonable burden will be placed upon this HUD funds recipient as a direct result of this state law. To the extent where it is deemed unlawful for the Housing Authority of the Birmingham District or its contracts qualify a person for employment, training, or contracting because their prior employment salary history cannot be learned or considered for certification, the overall agency compliance will be less than prescribed by the HUD benchmarks. Only if the new employees new annualized income meets the 80% low-income threshold for being considered Section 3, will any compliance be requested of new hires, trainees, or contractors.

State Alabama HB225 - This act shall be known as the Clarke-Figures Equal Pay Act.

ENROLLED, An Act, relating to wages; to prohibit an employer from paying any of its employees at wage rates less than those paid to employees of another sex or race for equal work unless a wage differential is based upon one or more specified factors. BE IT ENACTED BY THE LEGISLATURE OF ALABAMA:

(b) An employer shall not refuse to interview, hire, promote, or employ an applicant for employment, or retaliate against an applicant for employment because the applicant does not provide wage history. Wage history means the wages paid to an applicant for employment by the applicant's current or former employer.

Read the full Act:

<http://alisondb.legislature.state.al.us/ALISON/SearchableInstruments/2019RS/PrintFiles/HB225-enr.pdf>

All advertisements for positions with the authority will carry this wording:

"This opportunity is covered under Section 3 of the HUD Act of 1968"

Housing Authority of the Birmingham District **Contracting Procedure** Notice

For all advertised contracts led by the authority, the responsible staff will include the Section 3 Business Self Certification form and the Section 3 Individual Low-Income Self Certification form (with no income limit area) with the bid package (virtually and paper) allowing each respondent to identify themselves and their business accordingly. The completion of the forms will remain voluntary and at the respondent's discretion.

Once all responses have been received and reviewed, the most desirous and qualified business will be progressed through the contracting process. The Section 3 status of the respondent will be considered only after the "Most Qualified and Advantageous" respondent has been determined. Please note that due to that conflict with Alabama State Law HB225 - This act shall be known as the Clarke-Figures Equal Pay Act, there will be no area for contractors to confirm they meet any HUD income limit for Section 3 business owners. We still encourage contractors to recruit, train, and hire as many residents and voucher holders as possible. At a minimum, contractors should provide notice to the Section 3 coordinator so some outreach can be executed for any newly-created or available employment opportunities.

If there are multiple and equally qualified businesses, the Section 3 status and category of the business will be considered. The business with the highest Section 3 priority, based on the 24CFR Part 75.9 (b)(2) will be awarded the contract. All other applicable procurement laws will be adhered to relative to contracting amounts. All advertisements for contracts with the authority will carry this wording:

"This opportunity is covered under Section 3 of the HUD Act of 1968"

Housing Authority of the Birmingham District **Contractor Hiring Notice (CONTRACTOR MUST READ)**

As a direct result of the Alabama State Law HB225 - This act shall be known as the Clarke-Figures Equal Pay Act, contractors seeking to employ Section 3 level persons including those residents of HABD. The contractor is fully responsible for adhering to the state law and if they use the prescribed Section 3 Individual Self-Certification Form, there will be no place to request or confirm any person's income (current or past). If the contractor uses its own application process and violates the state law when working on an HABD contract, the contractor assumes all risk and penalties assessed for the violation. By this policy, HABD warns the contractor not to request the current or past income of any potential employee while working on HABD contract. All advertisements for contracts with the authority or its contractors, and sub-contractors must carry this wording:

"This opportunity is covered under Section 3 of the HUD Act of 1968"

Housing Authority of the Birmingham District Internal **Resident Training** Procedure

For all resident training offered by Housing Authority of the Birmingham District and its contractors, the staff will include the Section 3 Individual Low-Income Person Self Certification form with the training notice or upon the first day of training (virtually and paper) allowing each prospective trainee to identify themselves accordingly as public housing or Section 8. The completion of the form will NOT be voluntary

as the prospective trainees will be allowed to attend based on their prioritization in the 24CFR Part 75.9(a)(2).

If the training is being paid for with HUD Public Housing financial assistance, the training will be limited to residents and potentially voucher holders only.

All advertisements for training will carry this wording:

"This opportunity is covered under Section 3 of the HUD Act of 1968"

Policy Continues on the Next Page

Key Rule Components

Note: Where a portion of a Section specifically spoke to areas not related to Public Housing Assistance, those pieces were intentionally removed.

§ 75.1 Purpose.

This part establishes the requirements to be followed to ensure the objectives of Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) (Section 3) are met. The purpose of Section 3 is to ensure that economic opportunities, most importantly employment, generated by certain HUD financial assistance shall be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing or residents of the community in which the Federal assistance is spent.

§ 75.3 Applicability.

(a) General applicability. Section 3 applies to public housing financial assistance and Section 3 projects, as follows:

(1) Public housing financial assistance. Public housing financial assistance means:

(i) Development assistance provided pursuant to section 5 of the United States Housing Act of 1937 (the 1937 Act);

(ii) Operations and management assistance provided pursuant to section 9(e) of the 1937 Act;

(iv) The entirety of a mixed-finance development project as described in 24 CFR 905.604, regardless of whether the project is fully or partially assisted with public housing financial assistance as defined in paragraphs (a)(1)(i) through (iii) of this section.

(iii) The requirements in this part apply to an entire Section 3 project, regardless of whether the project is fully or partially assisted under HUD programs that provide housing and community development financial assistance.

(b) Contracts for materials. Section 3 requirements do not apply to material supply contracts.

(d) Other HUD assistance and other Federal assistance. Recipients that are not subject to Section 3 are encouraged to consider ways to support the purpose of Section 3.

§ 75.5 Definitions.

The terms HUD, Public housing, Public Housing Agency (PHA), and are defined in 24 CFR part 5. The also apply to this part: 1937 Act means the United States Housing Act of 1937, 42 U.S.C. 1437 et seq. Contractor means any entity entering into a contract with:

(1) A recipient to perform work in connection with the expenditure of public housing financial assistance or for work in connection with a Section 3 project; or

(2) A subrecipient for work in connection with a Section 3 project.

Labor hours means the number of paid hours worked by persons on a Section 3 project or by persons employed with funds that include public housing financial assistance.

Low-income person means a person as defined in Section 3(b)(2) of the 1937 Act.

Material supply contracts means contracts for the purchase of products and materials, including, but not limited to, lumber, drywall, wiring, concrete, pipes, toilets, sinks, carpets, and office supplies.

Professional services means non-construction services that require an advanced degree or professional licensing, including, but not limited to, contracts for legal services, financial consulting, accounting services, environmental assessment, architectural services, and civil engineering services.

Public housing financial assistance means assistance as defined in § 75.3(a)(1).

Public housing project is defined in 24 CFR 905.108.

Recipient means any entity that receives directly from HUD public housing financial assistance or housing and community development assistance that funds Section 3 projects, including, but not limited to, any State, local government, instrumentality, PHA, or other public agency, public or private nonprofit organization.

Section 3 means Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701u).

Section 3 business concern means:

(1) A business concern meeting at least one of the following criteria, documented within the last six-month period:

- (i) It is at least 51 percent owned and controlled by low- or very low-income persons;
- (ii) Over 75 percent of the labor hours performed for the business over the prior three- month period are performed by Section 3 workers; or
- (iii) It is a business at least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.

(2) The status of a Section 3 business concern shall not be negatively affected by a prior arrest or conviction of its owner(s) or employees.

(3) **Nothing in this part shall be construed to require the contracting or subcontracting of a Section 3 business concern.** Section 3 business concerns are not exempt from meeting the specifications of the contract.

Section 3 project means a project defined in § 75.3(a)(2).

Section 3 worker means:

- (1) Any worker who currently fits or when hired within the past five years fit at least one of the following categories, as documented:
- (i) The worker's income for the previous or annualized calendar year is below the income limit established by HUD.
 - (ii) The worker is employed by a Section 3 business concern.
 - (iii) The worker is a YouthBuild participant.

(2) The status of a Section 3 worker shall not be negatively affected by a prior arrest or conviction.

(3) Nothing in this part shall be construed to require the employment of someone who meets this definition of a Section 3 worker. Section 3 workers are not exempt from meeting the qualifications of the position to be filled.

Section 8-assisted housing refers to housing receiving project-based rental assistance or tenant-based assistance under Section 8 of the 1937 Act.

Service area or the neighborhood of the project means an area within one mile of the Section 3 project or, if fewer than 5,000 people live within one mile of a Section 3 project, within a circle centered on the Section 3 project that is sufficient to encompass a population of 5,000 people according to the most recent U.S. Census.

Small PHA means a public housing authority that manages or operates fewer than 250 public housing units.

Subcontractor means any entity that has a contract with a contractor to undertake a portion of the contractor's obligation to perform work in connection with the expenditure of public housing financial assistance or for a Section 3 project.

Subrecipient has the meaning provided in the applicable program regulations or in 2 CFR 200.93.

Targeted Section 3 worker has the meanings provided in §§ 75.11, 75.21, or 75.29, and does not exclude an individual that has a prior arrest or conviction.

Very low-income person means the definition for this term set forth in section 3(b)(2) of the 1937 Act.

YouthBuild programs refers to YouthBuild programs receiving assistance under the Workforce Innovation and Opportunity Act (29 U.S.C. 3226).

§ 75.9 Requirements

(a) Employment and Training.

(1) Consistent with existing Federal, state, and local laws and regulations, PHAs or other recipients receiving public housing financial assistance, and their contractors and subcontractors, must make their *best efforts to provide employment and training opportunities* generated by the public housing financial assistance to Section 3 workers.

(2) PHAs or other recipients, and their contractors and subcontractors, must make their best efforts described in paragraph (a)(1) of this section in the following order of priority:

- (i) To residents of the public housing projects for which the public housing financial assistance is expended;
- (ii) To residents of other public housing projects managed by the PHA that is providing the assistance or for residents of Section 8-assisted housing managed by the PHA;
- (iii) To participants in YouthBuild programs; and
- (iv) To low- and very low-income persons residing within the metropolitan area (or nonmetropolitan county) in which the assistance is expended.

(b) Contracting.

(1) Consistent with existing Federal, state, and local laws and regulations, PHAs and other recipients of public housing financial assistance, and their contractors and subcontractors, must make their *best efforts to award contracts and subcontracts to business concerns that provide economic opportunities to Section 3 workers*.

(2) PHAs and other recipients, and their contractors and subcontractors, must make their best efforts described in paragraph (b)(1) of this section in the following order of priority:

- (i) To Section 3 business concerns that provide economic opportunities for residents of the public housing projects for which the assistance is provided;
- (ii) To Section 3 business concerns that provide economic opportunities for residents of other public housing projects or Section-8 assisted housing managed by the PHA that is providing the assistance;
- (iii) To YouthBuild programs; and
- (iv) To Section 3 business concerns that provide economic opportunities to Section 3 workers residing within the metropolitan area (or nonmetropolitan county) in which the assistance is provided.

§ 75.11 Targeted Section 3 worker for Public Housing Financial Assistance.

(a) Targeted Section 3 worker. A Targeted Section 3 worker for public housing financial assistance means a Section 3 worker who is:

(1) A worker employed by a Section 3 business concern; or

(2) A worker who currently fits or when hired fit at least one of the following categories, as documented within the past five years:

(i) A resident of public housing or Section 8-assisted housing;

(ii) A resident of other public housing projects or Section 8-assisted housing managed by the PHA that is providing the assistance; or

(iii) A YouthBuild participant.

§ 75.13 Section 3 Safe Harbor. *(See Benchmarks on page 12)*

(a) General. Recipients will be considered to have complied with requirements in this part, in the absence of evidence to the contrary if they:

(2) Certify that they have followed the prioritization of effort in § 75.9; and

(3) (2) Meet or exceed the applicable Section 3 benchmark as described in paragraph (b) of this section.

§ 75.15 Reporting. *(See Benchmarks on page 12)*

(a) Reporting of labor hours. (1) For public housing financial assistance, PHAs and other recipients must report in a manner prescribed by HUD:

(i) The total number of labor hours worked;

(ii) The total number of labor hours worked by Section 3 workers; and

(iii) The total number of labor hours worked by Targeted Section 3 workers.

(2) Section 3 workers' and Targeted Section 3 workers' labor hours may be counted for five years from when their status as a Section 3 worker or Targeted Section 3 worker is established pursuant to § 75.31.

(3) The labor hours reported under paragraph (a)(1) of this section must include the total number of labor hours worked with public housing financial assistance in the fiscal year of the PHA or other recipient, including labor hours worked by any contractors and subcontractors that the PHA or other recipient is required, or elects pursuant to paragraph (a)(4) of this section, to report.

(4) PHAs and other recipients reporting under this section, as well as contractors and subcontractors who report to PHAs and recipients, may report labor hours by Section 3 workers, under paragraph (a)(1)(ii) of this section, and labor hours by Targeted Section 3 workers, under paragraph (a)(1)(iii) of this section, from professional services without including labor hours from professional services in the total number of labor hours worked under paragraph (a)(1)(i) of this section. If a contract covers both professional

services and other work and the PHA, other recipient, contractor, or subcontractor chooses not to report labor hours from professional services, the labor hours under the contract that are not from professional services must still be reported.

(5) PHAs and other recipients may report on the labor hours of the PHA, the recipient, a contractor, or a subcontractor based on the employer's good faith assessment of the labor hours of a full-time or part-time employee informed by the employer's existing salary or time and attendance-based payroll systems, unless the project or activity is otherwise subject to requirements specifying time and attendance reporting.

(b) Additional reporting if Section 3 benchmarks are not met.

If the PHA's or other recipient's reporting under paragraph (a) of this section indicates that the PHA or other recipient has not met the Section 3 benchmarks described in § 75.13, the PHA or other recipient must report in a form prescribed by HUD on the qualitative nature of its Section 3 compliance activities and those of its contractors and subcontractors. Such *qualitative efforts may, for example*, include but are not limited to the following:

- (1) Engaged in outreach efforts to generate job applicants who are Targeted Section 3 workers.
- (2) Provided training or apprenticeship opportunities. And others....

§ 75.17 Contract Provisions.

(a) PHAs or other recipients must include language in any agreement or contract to apply Section 3 to contractors.

(b) PHAs or other recipients must require contractors to include language in any contract or agreement to apply Section 3 to subcontractors.

(c) PHAs or other recipients must require all contractors and subcontractors to meet the requirements of § 75.9, regardless of whether Section 3 language is included in contracts.

§ 75.29 Multiple Funding Sources.

(a) If a housing rehabilitation, housing construction or other public construction project is subject to Section 3 pursuant to § 75.3(a)(1) and (2), the recipient must follow subpart B of this part for the public housing financial assistance and may follow either subpart B or C of this part for the housing and community development financial assistance. For such a project, the following applies:

(2) The recipients of both sources of funding shall report on the housing rehabilitation, housing construction, or other public construction project as a whole and shall identify the multiple associated recipients. PHAs and other recipients must report the following information:

- (i) The total number of labor hours worked on the project:
- (ii) The total number of labor hours worked by Section 3 workers on the project; and
- (iii) The total number of labor hours worked by Targeted Section 3 workers on the project

§ 75.31 Recordkeeping.

(b) Recipients must maintain documentation, or ensure that a subrecipient, contractor, or subcontractor that employs the worker maintains documentation, to ensure that workers meet the definition of a Section 3 worker or Targeted Section 3 worker, at the time of hire or the first reporting period, as follows:

(1) For a worker to qualify as a Section 3 worker, one of the following must be maintained:

- (i) A worker's self-certification that their income is below the income limit from the prior calendar year;
- (ii) A worker's self-certification of participation in a means-tested program such as public housing or Section 8-assisted housing;
- (iii) Certification from a PHA, or the owner or property manager of project-based Section 8-assisted housing, or the administrator of tenant-based Section 8-assisted housing that the worker is a participant in one of their programs;
- (iv) An employer's certification that the worker's income from that employer is below the income limit when based on an employer's calculation of what the worker's wage rate would translate to if annualized on a full-time basis; or
- (v) An employer's certification that the worker is employed by a Section 3 business concern.

(2) For a worker to qualify as a Targeted Section 3 worker, one of the following must be maintained:

(i) For a worker to qualify as a Targeted Section 3 worker under subpart B of this part:

- (A) A worker's self-certification of participation in public housing or Section 8-assisted housing programs;
- (B) Certification from a PHA, or the owner or property manager of project-based Section 8-assisted housing, or the administrator of tenant-based Section 8-assisted housing that the worker is a participant in one of their programs;
- (C) An employer's certification that the worker is employed by a Section 3 business concern; or
- (D) A worker's certification that the worker is a YouthBuild participant.

Benchmarks

For Public Housing Financial Assistance, the proposed benchmark notification set the benchmarks for the recipient's fiscal year. The proposed benchmark notification provided that recipients would meet the safe harbor in the new § 75.13 by certifying to the prioritization of effort in the new § 75.9 and meeting or exceeding Section 3 benchmarks for total number of labor hours worked by Section 3 workers and by Targeted Section 3 workers. The benchmark for Section 3 workers was set at 20 percent or more of the total number of labor hours worked by all workers paid with public housing financial assistance. The benchmark for Targeted Section 3 workers was set at 5 percent or more of the total number of labor hours worked by all workers paid with public housing financial assistance.

Simply stated, the recipient needs to meet these two benchmarks annually in order to achieve Safe Harbor.

Section 3 Workers Labor Hours = 20%
Total Labor Hours for the Recipient

Section 3 Targeted Workers Labor Hours = 5%
Total Labor Hours for the Recipient

SECTION 3 CONTRACT COMPLIANCE CURE AND TERMINATION PROCESSES

This language is a component of contract compliance with the work contractors and sub-contractors including developers respond to in HABD solicitations. Failure to meet this requirement will result in penalties up to and including contract termination.

HABD shall execute these remedies to achieve compliance in this order:

- A. Based on the first observation or report of non-compliance with Section 3, the contractor will be sent an e-mail from HABD notifying them of their non-compliance issue. The contractor will have until the next payroll or 14 calendar days, whichever is lesser to bring the contract into compliance.
- B. If at any time a contractor fails to bring the contract into compliance, HABD must withhold all future payments until the contract is in compliance.
- C. The contractor shall have up to 15 business days from the most recent notice of non-compliance to meet compliance as a final cure period or justify in writing to HABD why it cannot meet compliance. HABD must render a response to the contractor within 10 business days of receipt of its letter of reason for non-compliance. If HABD deems the cause to be unacceptable, at its option, HABD can extend the cause period one time for up to 5 days to allow the contractor to identify and secure other compliance options, or
- D. If the contractor fails to take any corrective action to bring the contract into compliance within seven (7) business days from the most recent notice of non-compliance, or HABD does not accept any of the contractor's corrective plans or justifications for non-compliance, HABD may terminate the contract immediately. HABD shall terminate by delivering to the Contractor a written Notice of Termination specifying the nature, extent and effective date of the termination. **All funds due to the contractor shall be held** and a financial workout of the agreement shall proceed within 24 hours of termination. All remaining funds can be paid out based on work satisfactorily completed per the agreement. Failure to comply with Section 3 may result in contract termination and/or prohibit bids for future contracts with HABD for at least one (1) year after the existing contract ends

Complaints

This policy is governed by the 24 CFR Part 135 – Section 3 Regulation and any future changes thereto. Any Section 3 resident or business concern that feels that the Section 3 regulations were not complied with may file a complaint directly to the Assistant Secretary for Fair Housing and Equal Opportunity at the following internet address: <http://portal.hud.gov/hudportal/documents/huddoc?id=958.pdf>

Forms Package Follows on the Next Page

This Section Left Blank Intentionally

Housing Authority of the Birmingham District

SECTION 3 NEW RULE 24 CFR Part 75

On November 30, 2020, HUD put into effect a New and Final Section 3 Rule for all recipients. This rule is drastically different from the old rule and therefore, we want everyone to know these requirements and plan accordingly.

Every contractor must ensure this package is included in their sub-contracts. Every sub-contractor must include this package in their lower-tiered sub-contracts.

This new rule exempts all material and supply only agreements. The rule applies to all service-related contracts/agreements despite the dollar amount or project duration, except CPA's, Attorneys, Engineers, and Architects.

There is an Order of Priority for employment that needs to be followed in the event there are multiple "equally" qualified persons for a job. Contracting is based on "Economic Opportunities" provided to Section 3 persons. Please ask if you desire to do any of these things.

Documents included in this package:

* New Requirements Summary	15
* Monthly Reporting Instructions	16
* Section 3 Business Self-Certification Forms	17
* Section 3 Individual Self-Certification Forms	18
* Hours Worked Reporting Form	19
* Acknowledgment and Affidavit Form	20

The Acknowledgement and Affidavit must be executed and returned by Every Contractor.

Housing Authority of the Birmingham District
Annual "Section 3 Benchmarks" Requirement Summary

- * Twenty (20) percent or more of the total number of labor hours worked by all workers employed with public housing financial assistance in a HA's fiscal year are Section 3 workers; and
- * Five (5) percent or more of the total number of labor hours worked by all workers employed with public housing financial assistance in a HA's fiscal year are Section 3 workers
- * There are No specific hiring or contracting goals under this new rule.
- * There is No Section 3 Business Preference under the new rule and No points awarded for being a Section 3 Business.
- * All person or business be fully qualified to perform the work.

The two new categories of Section 3 are now referred to as:

- * Section 3 Worker - Any low or very low-income persons residing in the Metropolitan area
- * Targeted Section 3 Worker - Public Housing, Voucher Holder, and YouthBuild participants

Contractors will provide these three (3) data sets to the Section 3 Consultant within 45 days of the month after the hours have been worked by EVERY person that worked directly on the contract. No back-office staff hours are counted:

- * Total Hours Worked by all workers
- * Total Hours Worked by Section 3 Workers (Individual Self-Certification Form Required)
- * Total Hours worked by Targeted Section 3 Workers (Individual Self-Certification Form Required)

There are new definitions of how to be a Section 3 Business Concern:

- * It is at least 51 percent owned by low- or very low-income persons; with businesses at least 6 months old
- * Over 75 percent of the labor hours performed for the business are performed by low- or very low-income persons; or (Based on the prior 90 days of full business payrolls)
- * It is a business at least 51 percent owned by current public housing residents or residents who currently live in Section 8-assisted housing, with businesses at least 6 months old

The Order of Priority starts with the persons at the property where the work is being done and then other HABD properties and Section 8 residents, then YouthBuild participants, lastly to the area.

STEP ONE

Enter your company name and the name of the contract or task you are performing in the appropriate lines at the top of the form.

STEP TWO

Determine which workers qualify as Section 3 by having each complete a Section 3 Individual Low- Income Person Self-Certification Form. This form is submitted once per Section 3 employee or those that believe they meet the definition of a Section 3 employee.

The form is to be completed by the individual and stress to the employee that the form is **Voluntary**:

1. Complete contact info section
2. Check the box that describes your situation
3. Sign and date the form
4. Complete the employer information
5. Return to your employer

STEP THREE

After determining which workers are Section 3, determine their classification based on what they check in the box on the form as **Non-Targeted** or **Targeted**:

Non-Targeted Workers are those low-income people who reside within the Housing Authority of the Birmingham District metro area

Targeted Workers are those low-income people who are currently active Housing Authority of the Birmingham District public housing , or Section 8 residents, and/or YouthBuild participants.

STEP FOUR

Enter the monthly dates of reporting on the first line, then proceed as follows:

1. Enter total hours worked by ALL contract or project level staff with exceptions as noted above*
2. Enter total hours worked by all Section 3 staff **Non-Targeted**
3. Enter total hours worked by all Section 3 staff **Targeted**

List **ONLY** the individual names of the workers who have self-certified as Section 3 (**Non-Targeted** and **Targeted**) along with their total hours for this month's report only.

STEP FIVE

Submit the Section 3 Hours Worked Reporting on a monthly basis in the electronic system provided by the Section 3 Consultant on a future communication.

Voluntary Self-Certification Form

IN COMPLIANCE WITH SECTION 3 OF THE HUD ACT OF 1968 UPDATED 24 CFR PART 75 11/30/2020

The purpose of this form is to comply with Section 3 of the HUD Act of 1968 Business Certification requirements. To count as a Section 3 Business your company/firm must meet one of the listed categories below. Each category will require additional documentation to support the election. You must provide that supporting documentation with this form properly completed to be confirmed as a Section 3 business. If this form is submitted without the required supplemental data, your certification will not be processed.

CATEGORY	DOCUMENTATION REQUIRED	YOUR ELECTION
a business at least 51 percent owned by low- or very low-income persons;	Proof of ownership showing all owners and their percentages and a completed Section 3 Individual Self-Certification form for all low- and very low-income owners	<input type="checkbox"/>
Over 75 percent of the labor hours performed for the business are performed by low- or very low-income persons; or	Provide the last 90 days full payrolls for the entire company, make a list of the names from the payrolls of the Section 3 workers, and provide a completed Section 3 Individual Self-Certification form for all low- and very low-income workers you list	<input type="checkbox"/>
It is a business at least 51 percent owned by current public housing residents or residents who currently live in Section 8-assisted housing.	Proof of ownership showing all owners and their percentages and a Section 3 Individual Self-Certification form for all public housing and/or Section 8 owners	<input type="checkbox"/>

I hereby certify to the US Department of Housing and Urban Development (HUD) that all of the information on this form is true and correct. I attest under penalty of perjury that my business meets the elected definition and understand proof of this information may be requested. If found to be inaccurate, I understand that I may be disqualified as a certified Section 3 business.

Full Name: _____

Company Name: _____

Street Address: _____

City: _____ State: _____ Zip: _____

Signature: _____ Date: _____

SECTION 3 INDIVIDUAL LOW-INCOME PERSON

Voluntary Self-Certification Form

IN COMPLIANCE WITH SECTION 3 OF THE HUD ACT OF 1968 UPDATED 24 CFR PART 75 11/30/2020

The purpose of this form is to comply with Section 3 of the HUD Act of 1968 self-certification income requirements. To count as a Section 3 individual, any legal resident of the United States annual income must not exceed the HUD income limits for the year before they were hired, or, the individual's current year income annualized for the year they are being confirmed as low-income.

Print Name

Phone

Email

Address

City

County

State

Zip

To qualify as a Section 3 Person, you must meet one of the standards in the brackets below and your individual annual income must not exceed the number in the box below.

Check only one box below that describes your situation:

- I am a low or very low-income person residing in the Housing Authority of the Birmingham District Metropolitan Area below
- My employer will certify that I am employed by a Section 3 business
- I reside in a Housing Authority of the Birmingham District Public Housing property
- I live in Section 8 housing administered by Housing Authority of the Birmingham District
- I am a current YouthBuild participant

The Birmingham-Hoover, AL HUD Metro FMR Area contains the following areas: Bibb County, AL; Blount County, AL; Jefferson County, AL; St. Clair County, AL; and Shelby County, AL.

I hereby certify to the US Department of Housing and Urban Development (HUD) that all of the information on this form is true and correct. I attest under penalty of perjury that my total income does not exceed the one shown above, and that proof of this information may be requested. If found to be inaccurate, I understand that I may be disqualified as a certified Section 3 individual.

Signature: _____

Date: _____

Income Limits website: <https://www.huduser.gov/portal/datasets/il/il2021/2021summary.odn>

SECTION 3

Housing Authority of the Birmingham District
Section 3 New Rule Contractor Acknowledgement and Affidavit
(Return this form with your Bid/Quote/Response/Contracts)

Company Name: _____

Contract or Project Name: _____

Trade Work/Classification: _____

I hereby certify to the US Department of Housing and Urban Development (HUD) that I have read all of the information in this policy package and agree to follow the requirements for complying with the order of prioritization in 75.9 and reporting of all labor hours associated with my contract as required. I further understand that failure to comply with these requirements will cause my payments to be held and not processed or not released until I come into full compliance with this policy.

Monthly, I will be required to provide these data points for all contract staff working directly on the contract not including any back-office staff:

- Total Hours Worked by all employees (Section 3 and regular employees)
- Total Hours Worked by All **Non-Targeted Section 3 employees** (Low-Income persons residing in the Housing Authority of the Birmingham District Metropolitan Area (MSA))
- Total Hours Worked by All **Targeted Section 3 employees** (Public Housing, Section 8, YouthBuild)

You are required to enter the names and hours worked by each Section 3 employee individually.

Signature: _____ Print: _____ Date: _____

Required Hours Worked Reporting

IN COMPLIANCE WITH SECTION 3 OF THE HUD ACT OF 1968 UPDATED 24 CFR PART 75 11/30/2020

The purpose of this form is to comply with Section 3 of the HUD Act of 1968 tracking of hours worked by all person's employed on a [Housing Authority of the Birmingham District](#) contract, including those meeting the Section 3 income requirements as low- or very low-income.

Section 3 Employees are now defined as:

Section 3 Workers - Any low or very low-income persons residing in the Housing Authority of the Birmingham District Metropolitan Area (MSA)

Targeted Section 3 Workers - I reside in public housing or Section 8 housing managed by Housing Authority of the Birmingham District or a current YouthBuild participants (If a program is active in the area)

If your company employs any person, it believes is low income now or was when they were hired within the past five years, please have them complete the SECTION 3 INDIVIDUAL LOW-INCOME PERSON SELF-CERTIFICATION FORM" and return it with their first report of employment in the Hours Worked Reporting System.

All hours worked by everyone on the project must be reported monthly in a manner prescribed by the Section 3 Coordinator. If you have questions to the following:

Jacqueline R. French
Director of Workforce Development/Section 3 Coordinator
Phone: 205.521.0614 - Cell: 205.329.0002 - Fax: 205.449.1221
jfrench@habd.net

You will report this information for your company as they apply.

- * Total Hours Worked by non-Section 3 staff
- * Total hours worked by all **Non-targeted Section 3** employees
- * Total hours worked by all **Targeted** Section 3 employee

Attachment I

Revised Safety and Crime Prevention



ATTACHMENT I: SAFETY AND CRIME PREVENTION

Whereas the Housing Authority of the Birmingham District (HABD) seeks to provide decent, safe and sanitary housing options for its residents, and whereas safety on its public housing sites is a priority of the HABD, a previous agreement was signed with the Birmingham Police Department (BPD) to provide above-baseline police, patrol, and security services for HABD's public housing community in the portfolio. Approved by the Board of Commissioners on March 1, 2022, this agreement with the Birmingham Police Department allows HABD to employ Community Safety Partners (BDP officers) to provide such services as BPD Community Safety Partners Agreement, community policing, and crime enforcement efforts on HABD properties.

Safety & Crime Prevention

Police Contract - HABD currently contracts with the City of Birmingham Police Department for above base line police services for the following HABD communities:

- a. Elyton Village
- b. Southtown Court
- c. Marks Village
- d. Smithfield Court
- e. Tom Brown Village
- f. Rev. Dr. Morrell Todd Homes
- g. Collegeville Center
- h. Harris Homes
- i. North Birmingham Homes
- j. Cooper Green Homes
- k. Kimbrough Homes
- l. Benjamin Greene Village
- m. Roosevelt City

The Neighborhood Block Watch Program allows citizens in Elyton Village, Southtown Court, Harris Homes, and Tuxedo Terrace the opportunity to assist Community Safety in partnership with Birmingham Police Department Community Relations Officers to recruit and train volunteers as Block Watch Captains. The Volunteers will act as a liason between the community and the police to keep the community safe by reporting crime and suspicious activity to the local police precinct. HABD has future plans to expand the program to the following communities:

- a. Marks Village
- b. Smithfield Court
- c. Tom Brown Village
- d. Rev. Dr. Morrell Todd Homes
- e. Collegeville Center
- f. North Birmingham Homes
- g. Cooper Green Homes
- h. Kimbrough Homes
- i. Benjamin Greene Village
- j. Roosevelt City

Safe Passage Program was implemented at Hayes Elementary School (K-8) in Rev. Dr. Morrell Todd Homes. HABD will partner with the Birmingham Police Department Community Safety Partnership, and Volunteers to provide safety on routes that children take to and from School. HABD has future plans to expand the program to all the following HABD communities:

- a. Elyton Village
- b. Marks Village
- c. Smithfield Court
- d. Tom Brown Village
- e. Rev. Dr. Morrell Todd Homes
- f. Collegeville Center
- g. North Birmingham Homes
- h. Cooper Green Homes
- i. Kimbrough Homes
- j. Benjamin Greene Village
- k. Roosevelt City

Speed Cushions were installed to prevent speeding on property in areas that children use to travel to and from school. HABD has future plans to install speed cushions in the following HABD communities:

- a. Harris Homes
- b. Marks Village

HABD Community Safety Department continues to pursue safety and crime prevention related to domestic violence by working with other departments and public housing sites to comply with VAWA and to provide security as needed for programs and events. For example, working with the HABD Client Services Department as it continues to bring in partners that provide counseling, programs, and education for our residents in regards to the steps needed to both prevent and report acts of domestic violence. HABD continues to have partners that are available daily to provide counseling as well as resources for those residents that are in need of assistance. The monthly Lunch and Learn programs held at multiple locations with multiple partners as well as the on-call Counselors that work with HABD reach and help as many residents as possible (The VAWA Policy is attached on the next page.)

HABD will partner with Birmingham Police Department, DHR, and other partners to bring domestic violence prevention programs to HABD sites. These programs will be held at least once every year including an agency wide program for residents and staff in the month of October to honor Domestic Violence Awareness Month.

Finally, another crime prevention measure would be to establish an In-house HABD Investigative Unit to deter, respond to, and investigate criminal activity in all HABD's owned properties and offices.

Attachment I – Safety and Crime Prevention: Violence Against Women Act Policy (VAWA)



Background

The Violence Against Women Act (VAWA) was enacted into federal law in 1994 to improve federal, tribal, state, and local efforts to reduce the incidence of violence towards women, domestic violence and sexual assault. Since 1994, VAWA has been reauthorized several times, extending the reach of the law and making its protections more robust. The most recent reauthorization was signed into law in March of 2022 and updated the housing-related language, added new enforcement mechanisms for HUD, and provided additional resources for training and technical assistance.

VAWA prohibits housing authorities and other covered housing providers from denying or terminating housing assistance to applicants or tenants because they have experienced domestic violence, dating violence, sexual assault, or stalking. Additionally, housing providers must provide certain remedies such as emergency transfers for reasons related to violence.

VAWA applies to all of the HUD programs that HABD administers, including the public housing, Housing Choice Voucher, project-based Section 8, and Section 8 Moderate Rehabilitation Single Room Occupancy programs. Although the name of the act suggests the law only applies to women, all persons, regardless of gender, are protected by the law and encouraged to take advantage of the mechanisms to enhance safety from violence.

Purpose

HABD fully supports the intent of the Violence Against Women Act and is committed to implementing associated regulations in full accordance with the law. This document unites existing HABD policy and procedure in one location to provide transparency, open access to these protections, and to simplify Agency response to VAWA-related issues. The policy also reflects the most recent changes to VAWA as of the date of approval. This policy applies to all programs administered by HABD, and all HABD employees are responsible for understanding and applying the policy in an effective manner. As this policy provides protections and rights which, in some cases, alter the manner in which HABD administers the covered programs, where there are conflicts between Agency policies such as the ACOP and Administrative Plan and this policy, this policy governs.

Policy

Admission and Termination of Assistance

HABD will not deny admission or assistance to any applicant on the basis of their status as a victim or survivor of domestic violence, dating violence, sexual assault, or stalking. HABD will not terminate assistance to or evict from housing any individual on the basis of their status as a victim or survivor of domestic violence, dating violence, sexual assault, or stalking.

HABD will not terminate assistance to any applicant on the sole basis of criminal activity directly relating to domestic violence, dating violence, sexual assault, or stalking committed by a member or guest of the household if the tenant or an affiliated individual of the tenant is the victim or threatened victim of criminal activity cited. Exceptions to this policy are:

- HABD will comply with a court order that assigns rights of access to or control of property
- HABD will enforce other lease and program provisions that may result in the termination of assistance to or eviction of a tenant who is a victim of covered violent acts

- HABD will enforce lease and program provisions if there is an actual and imminent threat to other tenants, employees, contractors, or others legally allowed to live or work on the premises of the dwelling occupied by the victim of covered violent acts if the victim is not terminated or evicted (§12491(b)(3)(C))

HABD will not discriminate or retaliate against any individual who has advocated for the rights of themselves or others in relation to VAWA, or who has filed or supported a complaint against HABD in connection with rights made available under VAWA.

HABD will not penalize any party, to include tenants, residents, occupants, guests, and applicants, based on their requests for assistance (for themselves or others) or based on criminal activity of which they are a victim or otherwise not at fault.

HUD Requirements

1. HABD's public housing leases contain the updated provisions of 24 CFR Part 5, Subpart L. To maintain consistency across programs, all HABD residential leases will contain these provisions.
2. HABD provides the VAWA Notice of Occupancy Rights to all adult applicants of public housing, HCV, PBV, and PBRA. To maintain consistency across programs, all applicants for housing assistance from HABD will be provided the notice (HUD Form 5380). Along with Form 5380, HABD will provide the Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternative Documentation, HUD Form 5382.
 - a. The form is also available at all management offices, the Rental Assistance Department, and the Central Office.
3. HABD provides the VAWA Notice of Occupancy Rights to any public housing, HCV, PBV, or PBRA tenant or participant at the time any HABD notification of eviction or termination of assistance is provided. To maintain consistency across programs, all tenants and participants in HABD's housing assistance programs will be provided the notice along with HUD Form 5382.
4. HABD will maintain all information relating to an applicant, tenant, or participant's status as a victim of covered activity (domestic violence, stalking, etc.) submitted by an applicant, tenant, or participant in strict confidence. No such information is to be entered into the HABD system of record, into shared electronic or hard copy files, or any database, or shared with any other entity or individual not involved with the claim, including other employees, with the exception of the following: Property Operations Department Head, Section 504/Reasonable Accommodations Coordinator, President/CEO, or a designee of the President/CEO.
5. Emergency Transfer Plan – HABD's Emergency Transfer Plan is attached to this Policy. It applies to all covered programs administered by HABD.

Certification and Documentation

HABD requires the provision of documentation when an individual presents a claim for VAWA protections. The claim itself may be presented in a verbal statement. The list of acceptable documentation is as follows:

- HUD Form 5382
- A written statement signed by an individual (employee, agent, or volunteer) associated with a victim service provider, an attorney, or medical or mental health professional from whom the victim sought assistance related to the covered acts of violence. The statement must be signed by the tenant/participant/application seeking VAWA protections.

- A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency
- Other evidence provided by the individual that supports the claim, including but not limited to audio/video recordings, communications from the perpetrator, or statements from individuals other than those providers and professionals listed above, however those statements must meet the same criteria.

The individual presenting the claim determines which documentation to supply. If HABD staff is already aware of the abuse, staff should provide a signed and dated statement in lieu of documentation if requested by the individual.

If the documentation provided conflicts with information provided by another individual, information separately available to HABD, or more than one individual claims to be the victim in the same situation, HABD will require third-party documentation claiming to be a victim of covered violent acts listed above (with the exception that the HUD Form 5382 is not considered third-party documentation).

In order to prevent any adverse action by HABD, the individual must provide all requested documentation within 30 calendar days of the date of the request. HABD will not schedule an eviction, grievance hearing, informal review, or informal hearing for the to take place until the 30 days has elapsed. Once that time period has elapsed, HABD will continue any enforcement of Agency policy the family is subject to. The family retains their rights to grievance hearings, informal hearings, and informal reviews regardless of their failure to submit documentation.

Family Break-up

HABD will take steps to preserve the assistance of the victim of domestic violence, dating violence, sexual assault, or stalking when terminating assistance or evicting the perpetrator of such violence.

Perpetrators will be allowed to rejoin the household at the request of the family if they meet all eligibility criteria.

Lease Bifurcation

HABD will, to the extent allowed by law, bifurcate leases in order to evict or terminate assistance to perpetrators of criminal activity directly related to domestic violence, dating violence, sexual assault, or stalking. Lease bifurcation removes the perpetrator from the unit without evicting or removing the victim from the unit.

If HCV/PBV owners decide to bifurcate a lease to an assisted family, HABD will assist the family with continued assistance if desired. Owners should notify HABD in advance of this action in order to offer assistance to the family. HABD will grant an exception to the established subsidy standard if, given the change in family composition, it would adversely impact the family.

If the family subject to lease bifurcation is a mixed family, and the victim is a member of the household who hasn't contended eligible immigration status, the remaining family members will have 30 days to indicate eligible immigration status to continue receiving assistance.

Perpetrators will be allowed to rejoin the household at the request of the family if they meet all eligibility criteria.

HCV Homeownership

Individuals assisted under the HCV Homeownership program may be provided with tenant-based assistance while owning the title or interest in the prior home, or be provided an exception to Agency policy on the number of allowable moves in a one-year period in order to protect the health and safety of the family/family member that has been the victim of domestic violence, dating violence, sexual assault, or stalking.

Resources

- VAWA's housing provisions are at [34 U.S.C. 12491, et seq](#)
- [PIH Notice 2017-08: Violence Against Women Reauthorization Act of 2013 Guidance](#)
- [H Notice 2017-05: Violence Against Women Act \(VAWA\) Reauthorization Act of 2013 – Additional Guidance for Multifamily Owners and Management Agents](#)
- [VAWA Regulations \(2013\)](#)
- [The Violence Against Women Act Reauthorization Act of 2022: Overview of Applicability to HUD Programs](#)

Definitions

Bifurcate

To divide a lease as a matter of law, subject to the permissibility of such process under the requirements of the applicable HUD-covered program and State or local law, such that certain tenants or lawful occupants can be evicted or removed and the remaining tenants or lawful occupants can continue to reside in the unit under the same lease requirements or as may be revised depending upon the eligibility for continued occupancy of the remaining tenants and lawful occupants.

Dating partner

The term "dating partner" refers to a person who is or has been in a social relationship of a romantic or intimate nature with the abuser, and where the existence of such a relationship shall be determined based on a consideration of—

- (A) the length of the relationship;
- (B) the type of relationship; and
- (C) the frequency of interaction between the persons involved in the relationship

Dating violence

The term "dating violence" means violence committed by a person—

- (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- (B) where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - (i) The length of the relationship.
 - (ii) The type of relationship.
 - (iii) The frequency of interaction between the persons involved in the relationship

Domestic violence

The term "domestic violence" includes felony or misdemeanor crimes committed by a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction receiving grant funding and, in the case of victim services, includes the use or attempted use of physical abuse or sexual abuse, or a pattern of any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim, including verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior, by a person who—

- (A) is a current or former spouse or intimate partner of the victim, or person similarly situated to a spouse of the victim;
- (B) is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
- (C) shares a child in common with the victim; or
- (D) commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction

Economic abuse

The term "economic abuse", in the context of domestic violence, dating violence, and abuse in later life, means behavior that is coercive, deceptive, or unreasonably controls or

restrains a person's ability to acquire, use, or maintain economic resources to which they are entitled, including using coercion, fraud, or manipulation to—

- (A) restrict a person's access to money, assets, credit, or financial information;
- (B) unfairly use a person's personal economic resources, including money, assets, and credit, for one's own advantage; or
- (C) exert undue influence over a person's financial and economic behavior or decisions, including forcing default on joint or other financial obligations, exploiting powers of attorney, guardianship, or conservatorship, or failing or neglecting to act in the best interests of a person to whom one has a fiduciary duty

Elder abuse

The term "elder abuse" means any action against a person who is 50 years of age or older that constitutes the willful—

- (A) infliction of injury, unreasonable confinement, intimidation, or cruel punishment with resulting physical harm, pain, or mental anguish; or
- (B) deprivation by a person, including a caregiver, of goods or services with intent to cause physical harm, mental anguish, or mental illness

Personally identifying information or personal information

The term "personally identifying information" or "personal information" means individually identifying information for or about an individual including information likely to disclose the location of a victim of domestic violence, dating violence, sexual assault, or stalking, regardless of whether the information is encoded, encrypted, hashed, or otherwise protected, including—

- (A) a first and last name;
- (B) a home or other physical address;
- (C) contact information (including a postal, e-mail or Internet protocol address, or telephone or facsimile number);
- (D) a social security number, driver license number, passport number, or student identification number; and
- (E) any other information, including date of birth, racial or ethnic background, or religious affiliation, that would serve to identify any individual

Sexual assault

Any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent

Stalking

The term "stalking" means engaging in a course of conduct directed at a specific person that would cause a reasonable person to—

- (A) fear for his or her safety or the safety of others; or
- (B) suffer substantial emotional distress

Technological abuse

The term "technological abuse" means an act or pattern of behavior that occurs within domestic violence, sexual assault, dating violence or stalking and is intended to harm, threaten, intimidate, control, stalk, harass, impersonate, exploit, extort, or monitor, except as otherwise permitted by law, another person, that occurs using any form of technology,

including but not limited to: internet enabled devices, online spaces and platforms, computers, mobile devices, cameras and imaging programs, apps, location tracking devices, or communication technologies, or any other emerging technologies

Attachment I – Safety and Crime
Prevention: Emergency Transfer Plan for
Victims of Domestic Violence, Dating
Violence, Sexual Assault, or Stalking



Housing Authority of the Birmingham District
Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence,
Sexual Assault, or Stalking

Emergency Transfers

The Housing Authority of the Birmingham District (HABD) is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),¹ HABD allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.² The ability of HABD to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether HABD has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections,

¹ Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

² Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

how an emergency transfer may occur, and guidance to tenants on safety and security.

This plan is based on a model emergency transfer plan published by the U.S.

Department of Housing and Urban Development (HUD), the Federal agency that oversees that HABD is in compliance with VAWA.

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation

To request an emergency transfer, the tenant shall provide notice to any of HABD's management or administrative offices. Staff will assist the tenant in completing and submitting an HABD Transfer Application. HABD will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under HABD's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

When completing the Transfer Application, the tenant should identify any location that would not be safe to move.

Confidentiality

HABD will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives HABD written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act (Form 5380) for more information about HABD's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

HABD cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. HABD will, however, act as quickly as possible to move a

tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. HABD may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If HABD has no safe and available units for which a tenant who needs an emergency is eligible, HABD will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. The tenant can also request, as an alternative, to be transferred to the Housing Choice Voucher (HCV) program. The tenant would have to submit an application and be eligible for assistance in the HCV program. At the tenant's request, HABD will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking include:

One Place, Metro Alabama Family Justice Center: <https://oneplacebirmingham.com/>,
205-453-7261

YWCA Central Alabama: <https://ywcabham.org/landing-page/end-domestic-violence/>,
205-322-9922

The Crisis Center (Central Alabama)

- Rape Response (205) 323-7273
- Main Line (205) 323-7777
- Teen Line (205) 328-LINK (205-328-5465)
- Kids' Help Line (205) 328-KIDS (205-328-5437)
- Senior Talk Line (205) 328-TALK (205-328-8255)

Attachment J

Asset Management



ATTACHMENT J: ASSET MANAGEMENT

Statement on Deferred Maintenance and Living Conditions at Public Housing Sites

As a part of yearly HUD requirements, all HABD Public Housing sites and units are inspected per the Uniform Physical Conditions Standards (UPCS) protocol. HABD contracted with a nationally recognized firm to conduct inspections during CY 2021 in accordance with the following conditions:

- a. HABD obtained a qualified, licensed, and professional firm to provide annual UPCS inspections and training for all public housing units and buildings.
- b. The annual inspection must comply with HUD requirements.
- c. The inspector provided a written report for each low-rent public housing unit, building, and development. The report should indicate if work orders were required, and if so, when the unit was re-inspected.
- d. The reports generated from this 100% UPCS inspection give HABD a snap shot in real-time as to the immediate condition of each unit thus allowing management and maintenance the necessary knowledge of conditions not meeting standards and allowing for maintenance to address immediate needs concerning living conditions at the properties. All reports will be shared with the Housing Operations Department. Upon receipt of these reports, Asset Maintenance Supervisors devise a detail plan of action from the report. The reports issued from these inspections include:
 1. Health and safety reports that note all exigent health and safety defects, as defined by REAC, and will be specifically documented to HABD on a daily basis. These issues will be abated by HABD maintenance staff within 24 hours of the finding.
 2. The Detailed Deficiency Report will include all level 1, 2, and 3 deficiencies for each unit, building, and development. This report will be used as a detailed back up for the PHAS inspection file.
 3. The unit deficiency review report provides a single sheet report for each unit should include all level 1, 2 and 3 deficiencies. This report serves as a unit-by-unit report purposed for the file of each resident's file.
- e. Tracking and Monitoring to Address Needs on a Monthly Basis
 1. From the UPCS inspection reports Asset Managers and/ or Asset Maintenance Supervisors will generate work orders to be placed in the Yardi property management software system. Monthly reports can be provide as needed to track these work orders.

HABD management and maintenance staff are still dealing with the dramatic effects of the COVID-19 pandemic on business processes. Employee absenteeism, supply chain, client illness, school closures, and continue to make basic operations challenging. Even still, site staff are working normal hours and we have resumed regular maintenance operations, housekeeping inspections, and are planning to resume the Preventative Maintenance Workplan.

Attachment K

Revised Substantial Deviation



ATTACHMENT K: SUBSTANTIAL DEVIATION

As part of the Rental Assistance Demonstration (RAD)/Choice Neighborhood Initiative (CNI) Program, the Housing Authority is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- a. Changes to the Capital Fund Budgets produced as a result of each approved RAD/CNI conversion, Section 18/RAD Blend regardless of whether the proposed conversion will include use of additional Capital Funds;
- b. Changes to the construction and/or rehabilitation plan for each approved RAD /CNI conversion; and
- c. Changes to the financing structure for each approved RAD/Section 18 Blend conversion.

Attachment L
Revised Significant
Amendment/Modification



ATTACHMENT L: SIGNIFICANT AMENDMENT/MODIFICATION

As mandated by the HUD, a public housing authority must define a substantial change to the Agency Plan. If a proposed change to the Agency Plan is considered a “substantial change,” it must undergo a public process that includes: consultation with the Resident Advisory Board, a public comment period, public notification of where and how the proposed change can be reviewed and approved by the Housing Authority Boards of Commissioners. Therefore, HABD defines significant changes to the Agency Plan as follow:

- a. Significant changes to tenant/resident admissions policies;
- b. Significant changes to the tenant/resident screening policy;
- c. Significant changes to public housing rent policies;
- d. Significant changes to the organization of the public housing or HCV waiting lists;
- e. Significant Changes in the use of replacement reserve funds under the Capital Fund Grant;
- f. Non-de-minimis changes to the identification of public housing units and/or property that will be subject to demolition, disposition, designation, or conversion activities; to exclude casualty or otherwise uninhabitable units.



Section B.2 contains new activities relating to the elements of the PHA Plan which are planned for Fiscal Year 2024. A summary of each revision is attached to this section.

Hope VI or Choice Neighborhoods. ✓

Mixed Finance Modernization or Development.

Demolition and/or Disposition. ✓

Designated Housing for Elderly and/or Disabled Families.

Conversion of Public Housing to Tenant Based Assistance

Conversion of Public Housing to Project-Based Assistance under RAD. ✓

Occupancy by Over-Income Families.

Occupancy by Police Officers. Project-Based Vouchers.

Units with Approved Vacancies for Modernization. ✓

Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). ✓

Attachment M

New Activities: HOPE VI and Choice Neighborhoods



B.2 NEW ACTIVITIES**ATTACHMENT M: HOPE VI and CHOICE NEIGHBORHOODS**

The Housing Authority of the Birmingham District (HABD) submitted a Choice Neighborhood Implementation Grant on January 10, 2023 for the Smithfield Court (AL001000009) community.

HABD reserves the right to apply for other Choice Neighborhood Initiative Implementation or Planning Grants for a public housing site to be identified as we assess the repositioning plan for its portfolio.

Attachment N

New Activities: Demolition and Disposition

Charts Showing Public Housing Units Proposed for Demolition and Disposition



ATTACHMENT N: DEMOLITION AND DISPOSITION

The Housing Authority of the Birmingham District (HABD) intends to submit Section 18 demolition applications during the plan year.

1. Thirty-five (35) structural damaged units located in multiple properties as identified on the attached chart.
2. Eight (8) units located at Ralph Kimbrough Homes (AL001000018) that were damaged by fire resulting in a total loss of the units.
3. Two Hundred and four (204) units located at Marks Village (AL001000006) were deemed obsolete and proposed for demolition.
4. Elyton Village Gymnasium (AL001000001) Proposed for demolition due to severe structural issue to the foundation.

HOUSING AUTHORITY OF THE BIRMINGHAM
DISTRICT 35 Structurally Damaged Units to be Demolished

Property	Number of Units to be demolished	Address	Unit Number
Collegetown Center	3	3021 31 st Avenue North	160
		3064 30 th Avenue North	175
		3070 30 th Avenue North	178
Elyton Village	12	329 3 rd Street West	61
		331 3 rd Street West	62
		333 3 rd Street West	63
		335 3 rd Street West	64
		337 3 rd Street West	65
		339 3 rd Street West	66
		301 3 rd Street West	75
		303 3 rd Street West	76
		305 3 rd Street West	77
		307 3 rd Street West	78
		309 3 rd Street West	79
311 3 rd Street West	80		
Kimbrough Homes	1	2801-F Wilson Road	203
Marks Village	3	7529 66 th Courtway South	298
		7501 66 th Street South	225
		6531 Interlaken Avenue South	226
Morrell Todd Homes	5	824-A 46 th Place North	109
		842-B 46 th Place North	110
		4604 8 th Court North	111
		4606 8 th Court North	112
		4523-B 8 th Terrace North	119
North Birmingham Homes	3	3133 44 th Avenue North	46
		3151 44 th Avenue North	37
		3000 42 nd Avenue North	257
Smithfield Court	8	274 8 th Avenue North	463
		276 8 th Avenue North	464
		278 8 th Avenue North	465
		280 8 th Avenue North	466
		282 8 th Avenue North	467
		284 8 th Avenue North	468
		842 3 rd Street North	475
		844 3 rd Street North	476
TOTAL	35		

Housing Authority of the Birmingham District 8 Casualty Loss Units to be Demolished							
	Property	Building Number	Unit Number	Address	Incident Date	Reported to Insurance Date	Expiration
1	AL001000018	000012	77	2904-A John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	04/30/2023
2	AL001000018	000012	78	2904-B John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	04/30/2023
3	AL001000018	000012	79	2904-C John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	04/30/2023
4	AL001000018	000012	80	2904-D John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	04/30/2023
5	AL001000018	000012	81	2904-E John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	04/30/2023
6	AL001000018	000012	82	2904-F John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	04/30/2023
7	AL001000018	000012	83	2904-G John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	04/30/2023
8	AL001000018	000012	84	2904-H John Bryan Road, Birmingham, AL 35211	04/26/2021	04/27/2021	04/30/2023

Housing Authority of the Birmingham District 204 Units for Demolition Disposition			
Housing Development	Unit Number	Building Number	Property Address
AL001000006	1	1	7524 Georgia Road South
AL001000006	1	2	7526 Georgia Road South
AL001000006	2	1	7528 Georgia Road South
AL001000006	2	2	7530 Georgia Road South
AL001000006	2	3	7532 Georgia Road South
AL001000006	2	4	7534 Georgia Road South
AL001000006	2	5	7536 Georgia Road South
AL001000006	2	6	7538 Georgia Road South
AL001000006	2	7	7540 Georgia Road South
AL001000006	2	8	7542 Georgia Road South
AL001000006	3	1	7544 Georgia Road South
AL001000006	3	2	7548 Georgia Road South
AL001000006	3	3	7552 Georgia Road South
AL001000006	3	4	6400 Joppa Court South
AL001000006	4	1	6401 Joppa Court South

AL001000006	4	2	7554 Georgia Road South
AL001000006	4	3	7558 Georgia Road South
AL001000006	4	4	7560 Georgia Road South
AL001000006	5	1	7562 Georgia Road South
AL001000006	5	2	7564 Georgia Road South
AL001000006	5	3	7566 Georgia Road South
AL001000006	5	4	7568 Georgia Road South
AL001000006	5	5	7570 Georgia Road South
AL001000006	5	6	7572 Georgia Road South
AL001000006	6	1	7574 Georgia Road South
AL001000006	6	2	7578 Georgia Road South
AL001000006	6	3	7582 Georgia Road South
AL001000006	6	4	6400 Kimberly Ave South
AL001000006	7	1	6410 Kimberly Ave South
AL001000006	7	2	6412 Kimberly Ave South
AL001000006	8	1	6411 Joppa Court South
AL001000006	8	2	6409 Joppa Court South
AL001000006	9	1	7547 64th Courtway South

AL001000006	9	2	7545 64th Courtway South
AL001000006	10	1	7543 64th Courtway South
AL001000006	10	2	7541 64th Courtway South
AL001000006	10	3	7539 64th Courtway South
AL001000006	10	4	7537 64th Courtway South
AL001000006	10	5	7535 64th Courtway South
AL001000006	10	6	7533 64th Courtway South
AL001000006	10	7	7531 64th Courtway South
AL001000006	10	8	7529 64th Courtway South
AL001000006	11	1	7527 64th Courtway South
AL001000006	11	2	7525 64th Courtway South
AL001000006	12	1	7522 Georgia Road South
AL001000006	12	2	7520 Georgia Road South
AL001000006	13	1	7518 Georgia Road South
AL001000006	13	2	7516 Georgia Road South
AL001000006	13	3	7514 Georgia Road South
AL001000006	13	4	7512 Georgia Road South
AL001000006	13	5	7510 Georgia Road South

AL001000006	13	6	7508 Georgia Road South
AL001000006	14	1	7506 Georgia Road South
AL001000006	14	2	7504 Georgia Road South
AL001000006	14	3	7500 Georgia Road South
AL001000006	14	4	6401 Interlaken Ave South
AL001000006	15	1	6415 Interlaken Ave South
AL001000006	15	2	7501 64th Courtway South
AL001000006	15	3	7505 64th Courtway South
AL001000006	15	4	7507 64th Courtway South
AL001000006	16	1	7509 64th Courtway South
AL001000006	16	2	7511 64th Courtway South
AL001000006	16	3	7513 64th Courtway South
AL001000006	16	4	7515 64th Courtway South
AL001000006	16	5	7517 64th Courtway South
AL001000006	16	6	7519 64th Courtway South
AL001000006	17	1	7521 64th Courtway South
AL001000006	17	2	7523 64th Courtway South
AL001000006	18	1	7524 64th Courtway South

AL001000006	18	2	7526 64th Courtway South
AL001000006	19	1	7528 64th Courtway South
AL001000006	19	2	7530 64th Courtway South
AL001000006	19	3	7532 64th Courtway South
AL001000006	19	4	7534 64th Courtway South
AL001000006	19	5	7536 64th Courtway South
AL001000006	19	6	7538 64th Courtway South
AL001000006	19	7	7540 64th Courtway South
AL001000006	19	8	7542 64th Courtway South
AL001000006	20	1	7544 64th Courtway South
AL001000006	20	2	7546 64th Courtway South
AL001000006	21	1	6423 Joppa Court South
AL001000006	21	2	6421 Joppa Court South
AL001000006	22	1	6419 Joppa Court South
AL001000006	22	2	6417 Joppa Court South
AL001000006	22	3	6415 Joppa Court South
AL001000006	22	4	6413 Joppa Court South
AL001000006	23	1	6414 Kimberly Ave South

AL001000006	23	2	6416 Kimberly Ave South
AL001000006	23	3	6418 Kimberly Ave South
AL001000006	23	4	6420 Kimberly Ave South
AL001000006	24	1	6422 Kimberly Ave South
AL001000006	24	2	6424 Kimberly Ave South
AL001000006	25	1	6426 Kimberly Ave South
AL001000006	25	2	6428 Kimberly Ave South
AL001000006	26	1	6427 Joppa Court South
AL001000006	26	2	6425 Joppa Court South
AL001000006	27	1	6435 Joppa Court South
AL001000006	27	2	6433 Joppa Court South
AL001000006	27	3	6431 Joppa Court South
AL001000006	27	4	6429 Joppa Court South
AL001000006	28	1	6430 Kimberly Ave South
AL001000006	28	2	6432 Kimberly Ave South
AL001000006	28	3	6434 Kimberly Ave South
AL001000006	28	4	6436 Kimberly Ave South
AL001000006	29	1	6438 Kimberly Ave South

AL001000006	29	2	6440 Kimberly Ave South
AL001000006	30	1	6439 Joppa Court South
AL001000006	30	2	6437 Joppa Court South
AL001000006	31	1	7522 64th Courtway South
AL001000006	31	2	7520 64th Courtway South
AL001000006	32	1	7518 64th Courtway South
AL001000006	32	2	7516 64th Courtway South
AL001000006	32	3	7514 64th Courtway South
AL001000006	32	4	7512 64th Courtway South
AL001000006	32	5	7510 64th Courtway South
AL001000006	32	6	7508 64th Courtway South
AL001000006	33	1	7504 64th Courtway South
AL001000006	33	2	7502 64th Courtway South
AL001000006	33	3	7500 64th Courtway South
AL001000006	33	4	6421 Interlaken Ave South
AL001000006	34	1	6501 Interlaken Ave South
AL001000006	34	2	6503 Interlaken Ave South
AL001000006	34	3	6505 Interlaken Ave South

AL001000006	34	4	6507 Interlaken Ave South
AL001000006	35	1	6502 Joppa Avenue South
AL001000006	35	2	6500 Joppa Avenue South
AL001000006	36	1	6504 Joppa Avenue South
AL001000006	36	2	6506 Joppa Avenue South
AL001000006	36	3	6508 Joppa Avenue South
AL001000006	36	4	6510 Joppa Avenue South
AL001000006	36	5	6512 Joppa Avenue South
AL001000006	36	6	6514 Joppa Avenue South
AL001000006	37	1	6519 Interlaken Ave South
AL001000006	37	2	6517 Interlaken Ave South
AL001000006	37	3	6515 Interlaken Ave South
AL001000006	37	4	6513 Interlaken Ave South
AL001000006	37	5	6511 Interlaken Ave South
AL001000006	37	6	6509 Interlaken Ave South
AL001000006	38	1	6527 Interlaken Ave South
AL001000006	38	2	6525 Interlaken Ave South
AL001000006	38	3	6523 Interlaken Ave South

AL001000006	38	4	6521 Interlaken Ave South
AL001000006	39	1	6516 Joppa Avenue South
AL001000006	39	2	6518 Joppa Avenue South
AL001000006	40	1	6503 Joppa Court South
AL001000006	40	2	6501 Joppa Court South
AL001000006	41	1	6500 Kimberly Ave South
AL001000006	41	2	6502 Kimberly Ave South
AL001000006	42	1	6504 Kimberly Ave South
AL001000006	42	2	6506 Kimberly Ave South
AL001000006	42	3	6508 Kimberly Ave South
AL001000006	42	4	6510 Kimberly Ave South
AL001000006	43	1	6511 Joppa Court South
AL001000006	43	2	6509 Joppa Court South
AL001000006	43	3	6507 Joppa Court South
AL001000006	43	4	6505 Joppa Court South
AL001000006	44	1	6515 Joppa Court South
AL001000006	44	2	6513 Joppa Court South
AL001000006	45	1	6514 Kimberly Ave South

AL001000006	45	2	6516 Kimberly Ave South
AL001000006	101	1	7551 65th Courtway South
AL001000006	101	2	7549 65th Courtway South
AL001000006	101	3	7547 65th Courtway South
AL001000006	101	4	7545 65th Courtway South
AL001000006	102	1	7531 65th Courtway South
AL001000006	102	2	7529 65th Courtway South
AL001000006	102	3	7527 65th Courtway South
AL001000006	102	4	7525 65th Courtway South
AL001000006	103	1	7543 65th Courtway South
AL001000006	103	2	7541 65th Courtway South
AL001000006	103	3	7539 65th Courtway South
AL001000006	103	4	7537 65th Courtway South
AL001000006	103	5	7535 65th Courtway South
AL001000006	103	6	7533 65th Courtway South
AL001000006	104	1	7532 65th Courtway South
AL001000006	104	2	7534 65th Courtway South
AL001000006	104	3	7536 65th Courtway South

AL001000006	104	4	7538 65th Courtway South
AL001000006	104	5	7540 65th Courtway South
AL001000006	104	6	7542 65th Courtway South
AL001000006	105	1	7524 65th Courtway South
AL001000006	105	2	7526 65th Courtway South
AL001000006	105	3	7528 65th Courtway South
AL001000006	105	4	7530 65th Courtway South
AL001000006	106	1	7544 65th Courtway South
AL001000006	106	2	7546 65th Courtway South
AL001000006	106	3	7548 65th Courtway South
AL001000006	106	4	7550 65th Courtway South
AL001000006	111	1	7545 Marks Drive South
AL001000006	111	2	7547 Marks Drive South
AL001000006	111	3	7549 Marks Drive South
AL001000006	111	4	7551 Marks Drive South
AL001000006	111	5	7553 Marks Drive South
AL001000006	111	6	7555 Marks Drive South
AL001000006	115	1	7525 Marks Drive South

AL001000006	115	2	7527 Marks Drive South
AL001000006	115	3	7529 Marks Drive South
AL001000006	115	4	7531 Marks Drive South
AL001000006	115	5	7533 Marks Drive South
AL001000006	115	6	7535 Marks Drive South
AL001000006	116	1	7537 Marks Drive South
AL001000006	116	2	7539 Marks Drive South
AL001000006	116	3	7541 Marks Drive South
AL001000006	116	4	7543 Marks Drive South

**Housing Authority of the Birmingham District Elyton Village Gymnasium
Proposed Demolition Disposition**

Housing Development	Building	Property Address
AL001000001	Gymnasium	31 4th Court West, Birmingham, AL 35204

Attachment O
New Activities: Conversion of Public
Housing to Project Based Assistance under
RAD – “Thrive 2035”



ATTACHMENT O: CONVERSION OF PUBLIC HOUSING to PROJECT-BASED ASSISTANCE under RAD



Thrive 2035 is the strategic framework through which the Housing Authority of Birmingham District will reposition our Public Housing portfolio and create new affordable housing in the City of Birmingham through the creation of **public/private partnerships** utilizing **private capital**. Conversion tools provided by HUD will result in the **elimination of all Public Housing** through the transition to other affordable housing platforms.

Repositioning is a mechanism through which properties are removed from the federal public housing restrictions and converted to project based rental assistance allowing access to private capital for renovation and redevelopment.

Decreased federal funding has resulted in a backlog of capital needs for public housing across the country of over \$60 Billion dollars. HABD estimates our capital needs at over \$500,000 million. HUD has provided PHA's with a variety of tools to reposition the Public Housing portfolio and HABD anticipates use of most tools available as described further below.

Thrive 2035 is the culmination of months of planning in which Public Housing properties have been assessed to determine continued viability. Based on physical and financial assessments, properties will be repositioned utilizing various redevelopment methods including moderate and substantial rehabilitation; disposition and demolition; and new construction of replacement units.

Our real estate repositioning strategy will improve the quality of affordable housing and assure that there is no loss of any affordable housing units in our community. HABD has partnered with experienced Development Teams to assist us in expediting our repositioning strategy.

RAD AND SECTION 18 BLEND WITH TRANSFER OF ASSISTANCE

The Housing Authority of Birmingham District (HABD) intends to submit RAD applications to convert the majority of the Public Housing communities to Project Based Vouchers (PBV) under the guidelines of PIH Notice 2019-23, REV 4 and any successor Notices. Upon conversion to PBVs, the Authority will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6 of PIH Notice 2019-23, REV 4 and PIH 2016-17. These residents' rights, participation, waiting list and grievance procedures are described below. Additionally, the Housing Authority of Birmingham District certifies that it is currently compliant with all Fair Housing and Civil Rights requirements and is not under a Voluntary Compliance Agreement.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing HABD with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Authority's Capital Fund budget will be reduced by the pro-rata share of Public Housing Developments converted as part of the demonstration and that HABD may also borrow fund to address their capital needs. HABD will also contribute Capital Funds, Public Housing Reserve Funds and non-federal funds to support the repositioning of the properties, as applicable.

The RAD conversions will include the following elements.

1. The unit count will remain the same pre-conversion and post-conversion.
2. Any change in bedroom distribution will be based on needs of the existing residents to assure protection all residents in accordance with the resident rights under the RAD Program.
3. It is anticipated that there will be RAD Transfer of Assistance to other locations/properties within Birmingham and no redevelopment of the existing public housing site. The TOA projects were determined based on environmental factors that may impede redevelopment of the existing site.

The chart below identifies each of the properties and the anticipated repositioning strategy.

PROJECT #	PROJECT NAME	# UNITS	REPOSITIONING STRATEGY
AL001000001	Elyton Village	478	RAD/Section 18 Blend
AL001000006	Marks Village	500	RAD/Section 18 Blend Transfer of Assistance
AL001000009	Smithfield Court	456	Choice Neighborhood Implementation Grant
AL001000010	Tom Brown Village	248	RAD/Section 18 Blend
AL001000011	Rev. Dr. Morrell Todd Homes	456	RAD/Section 18 Blend Transfer of Assistance
AL001000013	Collegeville	394	RAD/Section 18 Blend Transfer of Assistance
AL001000014	Harris Homes	188	RAD/Section 18 Blend
AL001000016	North Birmingham Homes	271	RAD/Section 18 Blend
AL001000017	Cooper Green	227	RAD/Section 18 Blend
AL001000018	Ralph Kimbrough Homes	231	RAD/Section 18 Blend
AL001000023	Roosevelt City	118	RAD/Section 18 Blend
AL001000031	Park Place	87	RAD
AL001000032	Park Place II	85	RAD
AL001000033	Park Place III	68	RAD
AL001000034	Tuxedo	56	RAD
AL001000035	Tuxedo Terrace II	54	RAD
AL001000037	Glenbrook	50	RAD
AL001000040	Mason City I	6	Complete 5h Homeownership

AL001000042	Mason City III	8	Complete 5h Homeownership
AL001000043	Mason City IV	1	Complete 5h Homeownership
AL001000044	Tuxedo Terrace Phase I	9	Complete 5h Homeownership
AL001000045	Tuxedo Terrace Phase II	6	Complete 5h Homeownership
AL001000046	Tuxedo Terrace III	6	Complete 5h Homeownership

RAD PBVs RESIDENT RIGHTS AND PARTICIPATION

1. No Re-screening of Tenants upon Conversion. Pursuant to the RAD statute, at conversion, current households are not subject to rescreening, income eligibility, or income targeting provisions. Consequently, current households will be grandfathered for conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion. For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, 24 CFR § 982.201, concerning eligibility and targeting, will not apply for current households. Once that remaining household moves out, the unit must be leased to an eligible family.

2. Right to Return. Any residents that may need to be temporarily relocated to facilitate rehabilitation or construction will have a right to return to an assisted unit at the development once rehabilitation or construction is completed. Where the transfer of assistance to a new site is warranted and approved (see Section 1.6.B.7 and Section 1.7.A.8 on conditions warranting a transfer of assistance), residents of the converting development will have the right to reside in an assisted unit at the new site once rehabilitation or construction is complete. Residents of a development undergoing conversion of assistance may voluntarily accept a PHA or Owner's offer to permanently relocate to another assisted unit, and thereby waive their right to return to the development after rehabilitation or construction is completed.

3. Renewal of Lease. Under current regulations at 24 CFR § 983.257(b)(3), upon lease expiration, a PHA can choose not to renew the lease, without good cause. In such a case, the regulatory consequence is the loss of the assisted unit. Under RAD, the PHA must renew all leases upon lease expiration, unless cause exists. Consequently, 24 CFR §983.257(b)(3) will not apply. This provision must be incorporated by the PBV owner into the tenant lease or tenancy addendum, as appropriate.

4. Phase-in of Tenant Rent Increases. If a tenant's monthly rent increases by more than the greater of 10 percent or \$25 purely as a result of conversion, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is waiving section 3(a) (1) of the Act, as well as 24 CFR §983.3 (definition of "total tenant payment" (TTP)) only to the extent necessary to allow for the phase- in of tenant rent increases. A PHA must create a policy setting the length of the phase in period at three years, five years or a combination depending on circumstances. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five-year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The below method explains the set percentage-based phase-in an owner must follow according to the phase-in period established. For purposes of this section “standard TTP” refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the “most recently paid TTP” refers to the TTP recorded on line 9j of the family’s most recent HUD Form 50058

HABD will utilize the Three-Year Phase-in:

- a. Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP and the standard TTP.
- b. Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 66% of difference between most recently paid TTP and the standard TTP
- c. Year 3: Year 3 AR and all subsequent recertifications – Full standard TTP

Please Note: Once the standard TTP is equal to or less than the previous TTP, the phase-in ends and tenants will pay full TTP from that point forward.

5. Public Housing Family Self Sufficiency (PH FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs. Current PH FSS participants will continue to be eligible for FSS once their housing is converted under RAD, and PHAs will be allowed to use any PH FSS funds granted previously or pursuant to the FY 2013 PH FSS NOFA, to serve those FSS participants who live in units converted by RAD and who will as a result be moving to the HCV FSS program, subject to the following:

- a. If a PHA has an HCV FSS program, a PHA must convert the PH FSS program participants at the covered project to their HCV FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion.
- b. If a PHA does not have an HCV FSS program, the PHA must establish an HCV FSS program and convert the PH FSS program participants at the covered project into their HCV FSS program. PHAs are not required to offer enrollment in FSS to residents in converting projects and other HCV participants, other than to residents in converting projects that were enrolled in the PH FSS program. Please see future FSS Notices of Funding Availability and other guidance for additional details, including FSS coordinator funding eligibility of PHAs under a RAD conversion. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR Part 984 and in accordance with the participants’ contracts of participation. However, residents who were converted from the PH FSS program to the HCV FSS program through RAD may not be terminated from the HCV FSS program or have HCV assistance withheld due to the participant’s failure to comply with the contract of participation. Consequently, 24 CFR 984.303(b)(5)(iii) does not apply to FSS participants in converted properties. Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is

converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future public housing. ROSS-SC grants, nor will its residents be eligible to be served by future public housing ROSS-SC grants.

6. Resident Participation and Funding. In accordance with Attachment 1B, residents of covered projects converting assistance to PBVs will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding.

7. Resident Procedural Rights. The following items must be incorporated into both the Section 8 Administrative Plan and the owner's lease, which includes the required tenancy addendum, as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

- a. Termination Notification. HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD. In addition to the regulations at 24 CFR § 983.257, related to owner termination of tenancy and eviction, as modified by the waiver in Section 1.6(C)(3) above, the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall not be less than:
 - i. A reasonable period of time, but not to exceed 30 days:
 - If the health or safety of other tenants, PHA employees, or persons residing in the immediate vicinity of the premises is threatened; or
 - In the event of any drug-related or violent criminal activity or any felony conviction;
 - ii. 14 days in the case of nonpayment of rent; and
 - iii. 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.
- b. Grievance Process. HUD is incorporating additional procedural rights to comply with the requirements of section 6 of the Act. For issues related to tenancy and termination of assistance, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24CFR § 982.555. RAD will waive 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, and require that:
 - i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(vi), an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a PHA (as owner) action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations,

welfare, or status.

- For any hearing required under 24 CFR § 982.555(a)(1)(i)-(vi), the contract administrator will perform the hearing, as is the current standard in the program.
 - For any additional hearings required under RAD, the PHA (as owner) will perform the hearing.
- ii. An informal hearing will not be required for class grievances or to disputes between residents not involving the PHA (as owner) or contract administrator. This hearing requirement shall not apply to and is not intended as a forum for initiating or negotiating policy changes between a group or groups of residents and the PHA (as owner) or contract administrator.
- iii. The PHA (as owner) give residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
- iv. The PHA (as owner) provide opportunity for an informal hearing before an eviction.

8. Earned Income Disregard (EID). Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited to only persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in section 5.617(b) limiting EID to only disabled persons is waived. The waiver and resulting alternative requirement only apply to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion (e.g., due to loss of employment); tenants that move into the property following conversion, etc.) is covered by this waiver.

9. Capital Fund Education and Training Community Facilities (CFCF) Program. CFCF provides capital funding to PHAs for the construction, rehabilitation, or purchase of facilities to provide early childhood education, adult education, and job training programs for public housing residents based on an identified need. Where a community facility has been developed under CFCF in connection to or serving the residents of an existing public housing project converting its assistance under RAD, residents will continue to qualify as

“PHA residents” for the purposes of CFCF program compliance. To the greatest extent possible the community facility should continue to be available to public housing residents

RAD PBV: Other Miscellaneous Provisions

1. Access to Records, Including Requests for Information Related to Evaluation of Demonstration. PHAs must agree to any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
2. Additional Monitoring Requirement. The PHA’s Board must approve the operating budget for the covered project annually in accordance with HUD requirements.
3. Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3). Under existing PBV program rules, projects that qualify as “existing housing” under 24 CFR § 983.52(a) are not subject to Davis-Bacon (prevailing wages, the Contract Work Hours and Safety Standards Act, and other related regulations, rules, and requirements) or Section 3 (24 CFR Part 135). However, the Davis-Bacon Act and Section 3 shall apply to all initial repairs that are identified in the Financing Plan to the extent that such repairs qualify as construction or rehabilitation, regardless of whether the project qualifies as “existing housing.” Developmental requirements under 24 CFR§983.154 and fair housing provisions under 24 CFR § 983.152(c)(vi) continue to apply.
4. Establishment of Waiting List. In establishing the waiting list for the converted project, the PHA shall utilize the project-specific waiting list that existed at the time of conversion, unless the assistance is being transferred to another neighborhood. If a project-specific waiting list does exist, but the PHA is transferring the assistance to another neighborhood, the PHA must notify applicants on the wait-list of the transfer of assistance, and on how they can apply for residency at the new project site or other sites. Applicants on a project-specific waiting list for a project where the assistance is being transferred shall have priority on the newly formed waiting list for the new project site in accordance with the date and time of their application to the original project's waiting list. In addition, the waiting list must be established and maintained in accordance with PBV program requirements.

If a project-specific waiting list for the project does not exist, the PHA shall establish a waiting list in accordance 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA’s public housing community-wide waiting list have been offered placement on the converted project’s initial waiting list. For the purpose of establishing the initial waiting list, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing waiting list given the number of applicants, PHA resources, and community characteristics of the proposed conversion under RAD. Such activities should be pursuant to the PHA’s policies for waiting list management, including the obligation to affirmatively further fair housing.

A PHA may consider contacting every applicant on the public housing waiting list via direct

mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area, informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate.

Applicants on the agency's centralized public housing waiting list who wish to be placed onto the newly-established waiting list are done so in accordance with the date and time of their original application to the centralized public housing waiting list. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and the obligation to provide meaningful access for persons with limited English proficiency (LEP). To implement this provision, HUD is waiving 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the converted project in accordance with 24 CFR § 983.251(c).

5. **Mandatory Insurance Coverage.** The project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed property of a project, except with the written approval of HUD to the contrary.

6. **Agreement Waiver.** For public housing conversions to PBV, there will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the Agreement (AHAP), including regulations under 24 CFR Part 983 Subpart D are waived.

7. **Future Refinancing.** Owners must receive HUD approval for any refinancing or restructuring of permanent debt within the HAP contract term to ensure the financing is consistent with long-term preservation. (Current lenders and investors are also likely to require review and approval of refinancing of the primary permanent debt.)

8. **Administrative Fees for Public Housing Conversions.** For the initial Calendar Year in which a project's assistance has been converted, RAD PBV projects will be funded with public housing money. Since the public housing funding will not have been transferred to the TBRA account and since this funding is not section 8 assistance the annual contributions contract (ACC) between the PHA and HUD will cover the project units, but be for zero dollars. For this transition period, the ACC will primarily serve as the basis for covering the units and requiring PHA compliance with HUD requirements, but it will not be (as it is in the regular PBV program) the funding vehicle for the PBV RAD vouchers. Given this, and given the fact that PHAs will be receiving full public housing funding for the PBV units during this transition period, PHAs will not receive ongoing section 8 administrative fee funding during this time.

Generally, PHAs receive ongoing administrative fees for units under a HAP contract, consistent with recent appropriation act references to "section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Responsibility Act of 1998" and 24 CFR 982.152(b). During the transition period mentioned in the preceding paragraph, these provisions are waived, and PHAs will not receive section 8

ongoing administrative fees for PBV RAD units.

After this transition period, the ACC will be amended to include section 8 funding that corresponds to the units covered by the ACC. At that time, the regular section 8 administrative fee funding provisions will apply.

Attachment P

New Activities: Occupancy by Police Officers



ATTACHMENT P: OCCUPANCY BY POLICE OFFICERS

Statement on Police Units

HABD does not have current plans for Police Officers to occupy any public housing units within the plan year.

Attachment Q

New Activities: Project Based Voucher Program



ATTACHEMENT Q: PROJECT BASED VOUCHERS

OTHER PROJECT BASED VOUCHERS

During the Plan Year, HABD will implement a PBV Program to assist in the repositioning strategies. The PBVs will also be used for the current redevelopment of Southtown Court and at other properties to be identified as replacement units for other Public Housing lost under the repositioning strategies. HABD anticipates utilization of 203 PBV's at the Southtown Development and commitments for approximately 300 PBV's for other public housing redevelopment efforts.

Additionally, HABD will use PBVs to meet the goals and objectives of HABD's 5 Year Plan, including through issuance of a solicitation or award of PBVs based on previous competition.

Attachment R

New Activities: Units Proposed for HUD Approved Vacancies – Undergoing Modernization

Charts Showing 276 Public Housing Units Approved as
Undergoing Modernization



Attachment R: Units Proposed for HUD Approved Vacancies – Undergoing Modernization

The Housing Authority of the Birmingham District (HABD) submitted 276 Modernization Units located in multiple properties as identified on the attached charts.

Elyton Village Modernization Units

Property	Building	Entranc e	Unit	Address	Effective Date	Expiration Date
AL001000001	000015	1	097	401 3rd Street West	2/21/2023	7/31/2023
AL001000001	000016	1	103	413 3rd Street West	2/21/2023	7/31/2023
AL001000001	000019	1	120	402 2nd Street West	2/21/2023	7/31/2023
AL001000001	000019	3	122	406 2nd Street West	2/21/2023	7/31/2023
AL001000001	000019	5	124	410 2nd Street West	2/21/2023	7/31/2023
AL001000001	000023	4	142	446 2nd Street West	2/21/2023	7/31/2023
AL001000001	000027	7	187	234 4th Court West	2/21/2023	7/31/2023
AL001000001	000045	3	290	413 2nd Street West	2/21/2023	7/31/2023
AL001000001	000048	4	301	435 2nd Street West	2/21/2023	7/31/2023
AL001000001	000051	4	318	432 Elyton Pkwy West	2/21/2023	7/31/2023
AL001000001	000094	5	587	41 4th Court West	2/21/2023	7/31/2023
AL001000001	000109	2	678	27 Graymont Ave West	2/21/2023	7/31/2023
AL001000001	000109	5	681	21 Graymont Ave West	2/21/2023	7/31/2023

Charles P. Marks Village Modernization Units

Property	Building	Entrance	Unit	Address	Effective Date	Expiration Date
AL001000006	000046	1	205	7587 66th Street South	2/21/2023	7/31/2023
AL001000006	000053	6	236	7518 66th Street South	2/21/2023	7/31/2023
AL001000006	000063	1	281	7569 66th Ctwy South	2/21/2023	7/31/2023
AL001000006	000065	3	291	7543 66th Court way South	2/21/2023	7/31/2023
AL001000006	000067	2	300	6622 Joppa Ave South	2/21/2023	7/31/2023
AL001000006	000069	3	313	6619 Interlaken Ave South	2/21/2023	7/31/2023
AL001000006	000070	1	303	6811 Interlaken Ave South	2/21/2023	7/31/2023
AL001000006	000070	3	305	6605 Interlaken Ave South	2/21/2023	7/31/2023
AL001000006	000073	1	327	7528 66th Ctwy South	2/21/2023	7/31/2023
AL001000006	000076	4	346	7568 66th Ctwy South	2/21/2023	7/31/2023
AL001000006	000078	6	406	7557 67th Ctwy South	2/21/2023	7/31/2023
AL001000006	000079	1	347	7555 67th Ctwy South	2/21/2023	7/31/2023
AL001000006	000083	3	367	6703 Interlaken Ave South	2/21/2023	7/31/2023
AL001000006	000089	1	391	7536 67th Ctwy South	2/21/2023	7/31/2023
AL001000006	000096	2	440	6833 Joppa Ave South	2/21/2023	7/31/2023
AL001000006	000096	3	441	6831 Joppa Ave South	2/21/2023	7/31/2023
AL001000006	000097	1	443	6827 Joppa Ave South	2/21/2023	7/31/2023
AL001000006	000097	3	445	6823 Joppa Ave South	2/21/2023	7/31/2023
AL001000006	000097	4	446	6821 Joppa Ave South	2/21/2023	7/31/2023
AL001000006	000097	5	447	6819 Joppa Ave South	2/21/2023	7/31/2023
AL001000006	000099	2	454	6805 Joppa Ave South	2/21/2023	7/31/2023
AL001000006	000108	2	468	6822 Joppa Ave South	2/21/2023	7/31/2023
AL001000006	000108	4	470	6826 Joppa Ave South	2/21/2023	7/31/2023

Smithfield Court Modernization Units						
Property	Building	Entrance	Unit	Address	Effective Date	Expiration Date
AL001000009	000003	2	018	48 8th Avenue North	2/21/2023	7/31/2023
AL001000009	000003	5	021	54 8th Avenue North	2/21/2023	7/31/2023
AL001000009	000006	1	040	836 1st Street North	2/21/2023	7/31/2023
AL001000009	000007	8	050	856 1st Street North	2/21/2023	7/31/2023
AL001000009	000015	9	107	843 Center Street North	2/21/2023	7/31/2023
AL001000009	000021	6	146	80 9th Avenue North	2/21/2023	7/31/2023
AL001000009	000021	7	147	82 9th Avenue North	2/21/2023	7/31/2023
AL001000009	000023	5	159	918 1st Street North	2/21/2023	7/31/2023
AL001000009	000023	6	160	920-1st Street North	2/21/2023	7/31/2023
AL001000009	000035	5	243	166 9th Avenue North	2/21/2023	7/31/2023
AL001000009	000036	4	250	908 2nd Street North	2/21/2023	7/31/2023
AL001000009	000036	5	251	910 2nd Street North	2/21/2023	7/31/2023
AL001000009	000038	5	269	946 2nd Street North	2/21/2023	7/31/2023
AL001000009	000039	1	273	171 9th Court North	2/21/2023	7/31/2023
AL001000009	000041	7	293	131 9th Court North	2/21/2023	7/31/2023
AL001000009	000043	3	305	931-1st Street North	2/21/2023	7/31/2023
AL001000009	000045	6	326	224-9th Avenue North	2/21/2023	7/31/2023
AL001000009	000047	5	341	254-9th Avenue North	2/21/2023	7/31/2023
AL001000009	000051	8	370	924-3rd Street North	2/21/2023	7/31/2023
AL001000009	000056	2	400	241-9th Court North	2/21/2023	7/31/2023
AL001000009	000061	8	440	228-8th Avenue North	2/21/2023	7/31/2023
AL001000009	000062	6	448	244-8th Avenue North	2/21/2023	7/31/2023
AL001000009	000063	2	450	248-8th Avenue North	2/21/2023	7/31/2023
AL001000009	000071	3	507	251-9th Avenue North	2/21/2023	7/31/2023
AL001000009	000073	2	518	229 9th Avenue North	2/21/2023	7/31/2023
AL001000009	000075	5	535	851-2st Street North	2/21/2023	7/31/2023

Tom Brown Village Modernization Units

Property	Building	Entrance	Unit	Address	Effective Date	Expiration Date
AL001000010	000018	8	602	575-41st Street North	2/21/2023	7/31/2023
AL001000010	000027	3	673	551-41st Place North	2/21/2023	7/31/2023
AL001000010	000028	2	676	545-41st Place North	2/21/2023	7/31/2023
AL001000010	000029	4	682	533-41st Place North	2/21/2023	7/31/2023
AL001000010	000032	6	698	4184-5th Court North	2/21/2023	7/31/2023
AL001000010	000034	5	709	4160-5th Court North	2/21/2023	7/31/2023
AL001000010	000036	1	715	4200 Airport Hwy	2/21/2023	7/31/2023
AL001000010	000036	5	719	4208 Airport Hwy	2/21/2023	7/31/2023
AL001000010	000039	2	732	4238 Airport Hwy	2/21/2023	7/31/2023

Rev Dr Morrell Todd Homes Modernization Units						
Property	Building	Entrance	Unit	Address	Effective Date	Expiration Date
AL001000011	000002	2	006	835 46th Place N	2/21/2023	7/31/2023
AL001000011	000007	6	028	4616-F Roscoe Ave N	2/21/2023	7/31/2023
AL001000011	000007	8	030	4616-H Roscoe Ave N	2/21/2023	7/31/2023
AL001000011	000011	3	057	4604-A Roscoe Ave N	2/21/2023	7/31/2023
AL001000011	000012	6	070	4607-B Roscoe Ave N	2/21/2023	7/31/2023
AL001000011	000012	8	072	4609-B Roscoe Ave N	2/21/2023	7/31/2023
AL001000011	000013	1	075	908-B 46th Place N	2/21/2023	7/31/2023
AL001000011	000013	6	080	904-A 46th Place N	2/21/2023	7/31/2023
AL001000011	000015	1	083	4605-A 9th Ave N	2/21/2023	7/31/2023
AL001000011	000015	7	089	4611-A 9th Ave N	2/21/2023	7/31/2023
AL001000011	000016	5	095	840-A 46th Place N	2/21/2023	7/31/2023
AL001000011	000018	1	099	830-A 46th Place N	2/21/2023	7/31/2023
AL001000011	000021	6	118	844 46th Street N	2/21/2023	7/31/2023
AL001000011	000022	2	120	4523-A 8th Terrace N	2/21/2023	7/31/2023
AL001000011	000024	1	133	836 45th Place N	2/21/2023	7/31/2023
AL001000011	000025	1	139	4507-B 8th Terrace N	2/21/2023	7/31/2023
AL001000011	000026	5	151	827 45th Street N	2/21/2023	7/31/2023
AL001000011	000027	5	157	815 45th Street N	2/21/2023	7/31/2023
AL001000011	000028	5	163	809-B 45th Street N	2/21/2023	7/31/2023
AL001000011	000029	2	170	846-B 46th Street N	2/21/2023	7/31/2023
AL001000011	000029	3	171	848-A 46th 46th Street	2/21/2023	7/31/2023
AL001000011	000030	6	182	4518-A 8th Terrace N	2/21/2023	7/31/2023
AL001000011	000030	8	184	4516-A 8th Terrace N	2/21/2023	7/31/2023
AL001000011	000032	6	196	845-B 45th Street N	2/21/2023	7/31/2023
AL001000011	000034	2	206	4517-B 9th Ave N	2/21/2023	7/31/2023
AL001000011	000034	4	208	4519-B 9th Ave N	2/21/2023	7/31/2023
AL001000011	000034	6	210	4521-B 9th Ave N	2/21/2023	7/31/2023
AL001000011	000034	7	211	4523-A 9th Ave N	2/21/2023	7/31/2023
AL001000011	000035	9	221	916 46th Street N	2/21/2023	7/31/2023
AL001000011	000037	2	226	4516-B 9th Ave N	2/21/2023	7/31/2023
AL001000011	000037	3	227	4516-C 9th Ave N	2/21/2023	7/31/2023
AL001000011	000038	5	239	909-F 45th Street N	2/21/2023	7/31/2023
AL001000011	000038	7	241	909-D 45th Street N	2/21/2023	7/31/2023
AL001000011	000039	2	246	905-B 45th Street N	2/21/2023	7/31/2023
AL001000011	000040	3	257	4508-B 9th Ave N	2/21/2023	7/31/2023
AL001000011	000042	3	271	4413-B 9th Terrace N	2/21/2023	7/31/2023
AL001000011	000043	2	274	927 44th Place N	2/21/2023	7/31/2023
AL001000011	000046	3	295	4418-A 9th Ave N	2/21/2023	7/31/2023
AL001000011	000050	1	317	4415-B 9th Ave N	2/21/2023	7/31/2023
AL001000011	000051	6	326	835-A 44th Place N	2/21/2023	7/31/2023
AL001000011	000052	7	337	821-B 44th Place N	2/21/2023	7/31/2023
AL001000011	000053	1	339	826-A 45th Street N	2/21/2023	7/31/2023
AL001000011	000053	3	341	828-A 45th Street N	2/21/2023	7/31/2023

AL001000011	000054	4	350	838-B 45th Street N	2/21/2023	7/31/2023
AL001000011	000054	7	353	842-A 45th Street N	2/21/2023	7/31/2023
AL001000011	000054	9	355	844 45th Street N	2/21/2023	7/31/2023
AL001000011	000055	3	359	817-B 44th Place N	2/21/2023	7/31/2023
AL001000011	000056	3	367	811-B 44th Place N	2/21/2023	7/31/2023
AL001000011	000060	6	398	822-B 45th Street N	2/21/2023	7/31/2023
AL001000011	000061	3	403	806-A 44th Place N	2/21/2023	7/31/2023
AL001000011	000061	8	408	810-B 44th Place N	2/21/2023	7/31/2023
AL001000011	000070	5	461	910-A 44th Place N	2/21/2023	7/31/2023
AL001000011	000071	2	468	920 44th Place N	2/21/2023	7/31/2023
AL001000011	000071	6	472	928 44th Place N	2/21/2023	7/31/2023
AL001000011	000073	6	482	938-B 44th Place N	2/21/2023	7/31/2023
AL001000011	000075	4	488	4345A R Arrington Jr Blvd N	2/21/2023	7/31/2023
AL001000011	000075	6	490	4343A R Arrington Blvd N	2/21/2023	7/31/2023
AL001000011	000075	9	493	4339 R Arrington Jr Blvd N	2/21/2023	7/31/2023
AL001000011	000076	4	498	4329 R Arrington Jr Blvd N	2/21/2023	7/31/2023

Collegeville Center Modernization Units						
Property	Building	Entrance	Unit	Address	Effective Date	Expiration Date
AL001000013	000002	4	006	3104 32nd Ave North	2/21/2023	7/31/2023
AL001000013	000004	1	009	3098-32nd Avenue, North	2/21/2023	7/31/2023
AL001000013	000004	2	010	3096 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000005	1	013	3088 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000005	12	024	3066 32nd avenue North	2/21/2023	7/31/2023
AL001000013	000005	2	014	3086 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000005	6	018	3078-32nd Avenue, North	2/21/2023	7/31/2023
AL001000013	000005	9	021	3072-32nd Avenue, North	2/21/2023	7/31/2023
AL001000013	000006	2	026	3060 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000006	3	027	3058-32nd Avenue, North	2/21/2023	7/31/2023
AL001000013	000006	5	029	3054 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000006	7	031	3050 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000007	2	038	3034 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000007	3	039	3032 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000009	1	045	3020 32nd Ave North	2/21/2023	7/31/2023
AL001000013	000009	2	046	3018-32nd Avenue, North	2/21/2023	7/31/2023
AL001000013	000009	6	050	3010 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000011	1	055	3001 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000011	6	060	3011 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000012	2	062	3017 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000014	6	074	3053 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000015	1	081	3069 32nd Ave North	2/21/2023	7/31/2023
AL001000013	000015	3	083	3073 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000017	5	099	3109 32nd Avenue North	2/21/2023	7/31/2023
AL001000013	000019	2	114	3080-31st Avenue, North	2/21/2023	7/31/2023
AL001000013	000019	9	121	3064 31st Avenue North	2/21/2023	7/31/2023
AL001000013	000020	5	127	3052 31st Avenue North	2/21/2023	7/31/2023
AL001000013	000020	7	129	3048 31st Avenue North	2/21/2023	7/31/2023
AL001000013	000022	8	150	3000 31st Avenue North	2/21/2023	7/31/2023
AL001000013	000025	1	161	3036-30th Avenue, North	2/21/2023	7/31/2023
AL001000013	000026	3	167	3048 30th Avenue North	2/21/2023	7/31/2023
AL001000013	000026	5	169	3052-30th Avenue, North	2/21/2023	7/31/2023
AL001000013	000026	6	170	3054 30th Avenue North	2/21/2023	7/31/2023
AL001000013	000027	1	177	3068 30th Avenue North	2/21/2023	7/31/2023
AL001000013	000027	10	186	3086-30th Avenue, North	2/21/2023	7/31/2023
AL001000013	000027	11	187	3088 30th Avenue North	2/21/2023	7/31/2023
AL001000013	000028	10	198	3018 31st Street North	2/21/2023	7/31/2023
AL001000013	000028	11	199	3020 31st Street North	2/21/2023	7/31/2023
AL001000013	000028	6	194	3010 31St Street North	2/21/2023	7/31/2023
AL001000013	000029	2	202	301131st Street North	2/21/2023	7/31/2023
AL001000013	000031	1	209	3000 F L Shuttlesworth	2/21/2023	7/31/2023

AL001000013	000031	4	212	3006 F L Shuttlesworth Dr	2/21/2023	7/31/2023
AL001000013	000032	7	219	3087 30th Avenue North	2/21/2023	7/31/2023
AL001000013	000034	1	229	3067 30th Avenue North	2/21/2023	7/31/2023
AL001000013	000034	4	232	3061 30th Avenue North	2/21/2023	7/31/2023
AL001000013	000034	5	233	3059 30th Avenue North	2/21/2023	7/31/2023
AL001000013	000035	1	235	3055 30th Avenue North	2/21/2023	7/31/2023
AL001000013	000035	2	236	3053 30th Avenue North	2/21/2023	7/31/2023
AL001000013	000036	1	239	3047 30th Avenue North	2/21/2023	7/31/2023
AL001000013	000036	4	242	3041 30th Avenue North	2/21/2023	7/31/2023
AL001000013	000037	1	251	3021 30th Avenue North	2/21/2023	7/31/2023
AL001000013	000038	2	260	3096 29th Court North	2/21/2023	7/31/2023
AL001000013	000038	3	261	3094 29th Court North	2/21/2023	7/31/2023
AL001000013	000040	1	277	3062 29th Court North	2/21/2023	7/31/2023
AL001000013	000040	3	279	3058 29th Court North	2/21/2023	7/31/2023
AL001000013	000040	5	281	3054 29th Court North	2/21/2023	7/31/2023
AL001000013	000041	4	286	3044 29th Court North	2/21/2023	7/31/2023
AL001000013	000041	6	288	3040 29th Court North	2/21/2023	7/31/2023
AL001000013	000043	3	295	3026 29th Court North	2/21/2023	7/31/2023
AL001000013	000044	1	305	3000-29th Court, North	2/21/2023	7/31/2023
AL001000013	000045	1	309	2948 29th Avenue North	2/21/2023	7/31/2023
AL001000013	000046	10	324	3045 29th Court North	2/21/2023	7/31/2023
AL001000013	000047	2	328	3055 29th Court North	2/21/2023	7/31/2023
AL001000013	000048	1	331	3065 29th Court North	2/21/2023	7/31/2023
AL001000013	000048	2	332	3067 29th Court North	2/21/2023	7/31/2023
AL001000013	000048	3	333	3069 29th Court North	2/21/2023	7/31/2023
AL001000013	000049	7	343	3093 29th Court North	2/21/2023	7/31/2023
AL001000013	000049	8	344	3095 29th Court North	2/21/2023	7/31/2023
AL001000013	000049	9	345	3097 29th Court North	2/21/2023	7/31/2023
AL001000013	000052	6	368	3022 29th Avenue North	2/21/2023	7/31/2023
AL001000013	000053	1	371	3014 29th Avenue North	2/21/2023	7/31/2023
AL001000013	000055	3	379	3013 29th Avenue North	2/21/2023	7/31/2023
AL001000013	000056	1	381	3021 29th Avenue North	2/21/2023	7/31/2023
AL001000013	000064	2	422	2937 29th Avenue North	2/21/2023	7/31/2023
AL001000013	000064	3	423	2939 29th Avenue North	2/21/2023	7/31/2023
AL001000013	000065	1	425	2828 30th Street North	2/21/2023	7/31/2023

North Birmingham Homes Modernization Units						
Property	Building	Entrance	Unit	Address	Effective Date	Expiration Date
AL001000016	000001	2	254	4189 30th Street N	2/21/2023	7/31/2023
AL001000016	000005	3	201	3014 41st Court N	2/21/2023	7/31/2023
AL001000016	000005	6	204	3008 41st Court N	2/21/2023	7/31/2023
AL001000016	000009	4	228	4168 31st Street N	2/21/2023	7/31/2023
AL001000016	000013	3	181	3015 41st Court N	2/21/2023	7/31/2023
AL001000016	000013	5	183	3011 41st Court N	2/21/2023	7/31/2023
AL001000016	000013	8	186	3005 41st Court N	2/21/2023	7/31/2023
AL001000016	000013	9	187	3003 41st Court N	2/21/2023	7/31/2023
AL001000016	000015	2	164	4159 31st St N	2/21/2023	7/31/2023
AL001000016	000016	3	161	4165 31st St N	2/21/2023	7/31/2023
AL001000016	000020	4	128	3133 42nd Ave N	2/21/2023	7/31/2023
AL001000016	000023	3	119	3151 42nd Ave N	2/21/2023	7/31/2023
AL001000016	000025	6	112	3169 42nd Ave N	2/21/2023	7/31/2023
AL001000016	000028	1	099	3165 43rd Ave N	2/21/2023	7/31/2023
AL001000016	000029	5	089	3191-A 42nd Ave N	2/21/2023	7/31/2023
AL001000016	000029	7	091	3189-A 42nd Ave N	2/21/2023	7/31/2023
AL001000016	000029	9	093	3187 A 42nd Ave N	2/21/2023	7/31/2023
AL001000016	000030	2	076	3147 43rd Ave N	2/21/2023	7/31/2023
AL001000016	000030	9	083	3133 43rd AVE N	2/21/2023	7/31/2023
AL001000016	000031	6	070	3175 43rd Ave N	2/21/2023	7/31/2023
AL001000016	000033	2	028	3169 44th Ave N	2/21/2023	7/31/2023
AL001000016	000033	6	032	3161 41st Court N	2/21/2023	7/31/2023
AL001000016	000034	2	038	3149 44th Ave N	2/21/2023	7/31/2023
AL001000016	000039	1	265	3016 42nd Ave N	2/21/2023	7/31/2023
AL001000016	000039	4	268	3022 42nd Ave N	2/21/2023	7/31/2023
AL001000016	000040	3	263	3012 42nd Ave N	2/21/2023	7/31/2023
AL001000016	000042	4	292	4213 Cheek Road	2/21/2023	7/31/2023
AL001000016	000042	5	293	4211 Cheek Road	2/21/2023	7/31/2023
AL001000016	000043	4	288	3001 44th Ave N	2/21/2023	7/31/2023
AL001000016	000044	2	282	3013 44th Ave N	2/21/2023	7/31/2023
AL001000016	000045	2	278	3021 44th Ave N	2/21/2023	7/31/2023
AL001000016	000046	4	004	3006 44th Ave N	2/21/2023	7/31/2023
AL001000016	000046	5	005	3008 44th Ave N	2/21/2023	7/31/2023
AL001000016	000047	3	013	3104 44th Ave N	2/21/2023	7/31/2023
AL001000016	000049	3	021	3120 44th Ave N	2/21/2023	7/31/2023

Ralph Kimbrough Homes Modernization Units

Property	Building	Entrance	Unit	Address	Effective Date	Expiration Date
AL001000018	000002	8	012	2800-H John Bryan Rd.	2/21/2023	7/31/2023
AL001000018	000003	3	017	2804-C John Bryan Rd	2/21/2023	7/31/2023
AL001000018	000003	4	018	2804- D John Bryan Rd	2/21/2023	7/31/2023
AL001000018	000003	8	022	2804-H John Bryan Rd	2/21/2023	7/31/2023
AL001000018	000005	10	036	2812-J John Bryan Rd	2/21/2023	7/31/2023
AL001000018	000005	7	033	2812-G John Bryan Rd	2/21/2023	7/31/2023
AL001000018	000005	9	035	2812-I John Bryan Rd	2/21/2023	7/31/2023
AL001000018	000006	2	038	2816-B John Bryan Rd	2/21/2023	7/31/2023
AL001000018	000010	5	069	2825-E John Bryan Rd	2/21/2023	7/31/2023
AL001000018	000011	3	073	2901- C John Bryan Rd	2/21/2023	7/31/2023
AL001000018	000013	2	086	2905-B John Bryan Rd	2/21/2023	7/31/2023
AL001000018	000017	4	104	2920- S.J Bennett Dr.	2/21/2023	7/31/2023
AL001000018	000018	3	109	2916-C S.J. Bennett Dr	2/21/2023	7/31/2023
AL001000018	000019	5	119	2912-E S.J. Bennett Dr	2/21/2023	7/31/2023
AL001000018	000022	4	136	2905- D Wilson Rd	2/21/2023	7/31/2023
AL001000018	000024	8	152	2906-H S.J. Bennett Dr	2/21/2023	7/31/2023
AL001000018	000025	2	156	2904-B S.J. Bennett Dr	2/21/2023	7/31/2023
AL001000018	000025	4	158	2904-D S J Bennett Drive	2/21/2023	7/31/2023
AL001000018	000025	6	160	2904- F S.J Bennett Dr.	2/21/2023	7/31/2023
AL001000018	000025	8	162	2904-H S.J Bennett Dr.	2/21/2023	7/31/2023
AL001000018	000026	1	165	2813-A S.J Bennett Dr.	2/21/2023	7/31/2023
AL001000018	000026	2	166	2813- B W. Covington Circle	2/21/2023	7/31/2023
AL001000018	000027	1	167	2809-A W. Covington Circle	2/21/2023	7/31/2023
AL001000018	000028	2	176	2805-B W. Covington Circle	2/21/2023	7/31/2023
AL001000018	000029	1	179	2801-A W. Covington Circle	2/21/2023	7/31/2023
AL001000018	000030	5	184	2800-F John Bryan Rd	2/21/2023	7/31/2023
AL001000018	000030	6	185	2800-E W. Covington Circle	2/21/2023	7/31/2023
AL001000018	000030	8	187	2800-H W. Covington Circle	2/21/2023	7/31/2023
AL001000018	000031	5	192	2804- E W Covington Circle	2/21/2023	7/31/2023
AL001000018	000035	2	213	2812-B W. Covington Circle	2/21/2023	7/31/2023
AL001000018	000035	5	216	2812-E W. Covington Circle	2/21/2023	7/31/2023
AL001000018	000036	1	222	2809-A Wilson Road	2/21/2023	7/31/2023

Benjamin Greene Modernization Units						
Property	Building	Entrance	Unit	Address	Effective Date	Expiration Date
AL001000023	001BG	1	001	3531 45th Street SW	2/21/2023	7/31/2023
AL001000023	001BG	3	003	3535 45th Street SW	2/21/2023	7/31/2023
AL001000023	008BG	4	030	3589 45th Street SW	2/21/2023	7/31/2023

Attachment S

New Activities: Other Capital Grant Programs



ATTACHMENT S: OTHER CAPITAL GRANT PROGRAMS

HABD will apply for HUD Capital Fund grants as they become available. HABD will also consider applying for grants to assist in the development of affordable housing, public safety, and social services.

B.3 Progress Report



Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

B.3 Progress Report



Below are statements regarding HABD's progress made towards meeting goals in the previous 5-Year Plan.

PHA Goal: Expand the supply of assisted housing

1. Apply for additional rental vouchers:
 - a. Rental Assistance Department received 25 incremental vouchers, effective 10/01/2022
 - b. Rental Assistance Department applied for Stability Vouchers, which is one of HUD's new proposed programs
 - c. Villas at Titusville II is currently online, as of February, 2022, and have leased all 62 units

PHA Goal: Improve the quality of assisted housing

1. Improve voucher management: (SEMAP score) change and/or maintain High Performer Status within SEMAP scoring
 - a. Rental Assistance maintained High Performer status score of 93
2. Provide replacement vouchers
 - a. Villas II has 62 PBVs, which went online February 2022

The HABD Housing Operations staff continues to make a concentrated effort to maintain high public housing occupancy numbers in an effort to provide decent safe, and sanitary housing to persons of low to moderate income. The agency has continued to use Force Account labor teams that are tasked with improving physical conditions of units prior to re- occupancy. The application process, previously removed from each individual site and made centralized, continues to ensure maximum application processing and occupancy efforts.

1. Staff accountability regarding occupancy rates has been heavily stressed and is an integral part of each Asset Manager's yearly goals. The last fiscal year, 2022, closed with an adjusted occupancy rate of 92.71%.
2. Continued high reporting rate for 50058s for Section 8 and Public Housing
3. Provide replacement vouchers:
 - a. HABD received 489 Tenant Protection Vouchers for relocation efforts

PHA Goal: Increase assisted housing choices

1. Implement voucher homeownership program -change to increase participation on the voucher homeownership program.
 - a. Currently have 18 program participants
 - b. In 2022, we have added 179 new landlords to the program (as of 12.22.2022)

PHA Goal: Provide an improved living environment

1. HABD completed demolition of Southtown Court Phase 1 (Block B, C and D) public housing site. Currently, the agency is in the pre development phase of developing affordable housing units. HABD was awarded Lowing Housing Tax Credits for a family and senior building on Block D.
2. We relocated 218 households in the HCV program, 66 households were relocated to another HABD Property, 37 were moved into private market housing, 98 want to return to Southtown. Two former Southtown public housing residents were converted to homeowners
3. The overall year to date criminal statistics for HABD are as follow:
 - a. Violent Crime is down negative: 31.2%
 - b. Property Crime is down negative 27.0%
 - c. Overall Crime is down negative 29.1%
4. **City Action Partnership (CAP)**- CAP provided debris removal, street outreach, and relocation services for vagrant and homeless persons that frequently camp outside of HABD Properties in the downtown area.
5. **Virtual Public Safety Zoom Meetings by HABD Public Safety and Contract Law Enforcement Agency.** Monthly virtual zoom meetings were held to provide a forum for clients to interact with the Director of Public Safety and the Birmingham Police Department Community Safety Partnership Contract Law Enforcement Agency.
6. **Contract Law Enforcement Agency Complaint Form- The contract law enforcement agency.** Complaint forms were used to allow staff and clients to document criminal complaints. These criminal complaints were investigated by HABD Public Safety and the Birmingham Police Department Community Safety Partnership Contract Law Enforcement Agency.
7. **Implement Neighborhood Block Watch Program by Local Law Enforcement Agency.**
The neighborhood block watch program was expanded to Elyton Village.
8. **Implement Safe Passage Program by HABD Public Safety and Contract Law Enforcement Agency.** The Safe Passage Program continued to service the Tom Brown and Morrell Todd Homes communities by providing safe routes for children walking to and from Hayes Elementary School (K-8).

9. **Implement Gate Attendants.** Gate attendants evening and weekend shifts were added at Collegeville Center and North Birmingham Homes gated communities.
10. **HABD Critical Response Team.** The Response team responded to several incidents on HABD properties. Grief counseling services were provided in person and by phone to clients in the aftermath of traumatic experiences. Services were provided in person and by phone at the client's request.
11. **HABD Anonymous TIP Line.** Numerous residents and citizens utilized the TIP line to report crimes and policy violations which led to drug bust, arrest, and corrective actions.
12. **Police Youth Talk.** Local contract police agency meets with youth to discuss various subjects to include, bullying, gun safety, drugs, domestic violence, and law violations.
13. **Lighting Upgrade to LED and Assessments for Additional Lighting by Alabama Power.** Lighting assessments were completed and LED lighting was added to all needed HABD properties.
14. **Cameras and License Plate Readers LPRs.** Cameras and LPRs were added to all HABD properties. Cameras have been instrumental in identifying offenders, leading to arrest, and closing investigations within hours of crimes being committed. HABD Camera Systems are federated with the Birmingham Police Department Real Time Crime Center.
Active Shooter Training Provided by Jefferson County Sheriff's Office, Jefferson County Training Academy. Active shooter training was provided by Jefferson County Sheriff's Office Training Academy. This training provided staff with the knowledge of what to do in the case of an active shooter.
15. **VAWA EMERGENCY TRANSFER PLAN.** The Violence Against Women Act (VAWA) was used to identify victims of domestic violence and provide assistance to clients in HABD communities. Eligible clients were transferred due to being victims of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L
16. **Witness Relocation Agreement.** When a credible witness/resident was identified by the local contract law enforcement agency, a section 8 voucher is issued to relocated the witness.
17. **Contract Officers Patrolling HABD Properties.** Seven Officers, One Sergeant, and One Captain.

PHA Goal: Promote self-sufficiency and asset development of assisted households

1. Goal 1: Increase and maintain the participation rate in the FSS Program to at least 100% annually.
2. Goal 2: 100% of FSS employed participants will maintain employment.
3. Goal 3: Increase the number of the FSS Participants with Escrow Accounts annually.

4. Goal 4: To continue to sponsor the Annual George A. Pegues Annual Memorial FSS Golf Tournament to raise monies to assist the participants with supportive services, including (but not limited to) child care, transportation, and education.
5. Goal 5: To sponsor an Annual Career and Jobs Fair to increase the number of working families participating in the FSS Program

PHA Goal: Ensure equal opportunity and affirmatively further fair housing

1. HABD continues to comply with Fair Housing Act regulations in an effort to provide non discriminatory housing and community development programs
2. HABD employee attend Fair Housing training annually to ensure employees are knowledgeable of Fair Housing Act updates.
3. HABD continue to comply with the Fair Housing Act by increasing awareness to our residents and community partners with the various HUD conversion transformation programs

PHA Goal: Take a leadership role in the creation of significant additional organizational capacity to provide and maintain quality affordable housing in Birmingham and the region.

1. Thrive 2035 was developed creating a plan to reposition all properties in the public housing portfolio. Thrive 2035 is the culmination of months of planning in which Public Housing properties have been assessed to determine continued viability. Based on physical and financial assessments, properties will be repositioned utilizing various redevelopment methods including moderate and substantial rehabilitation; disposition and demolition; and new construction of replacement units. Our real estate repositioning strategy will improve the quality of affordable housing and assure that there is no loss of any affordable housing units in our community. HABD has partnered with experienced Development Teams to assist us in expediting our repositioning strategy.
2. The Smithfield/College Hills/Graymont Choice Neighborhood implementation grant was submitted. The Birmingham Choice Team HABD (Lead Applicant) assembled a team with local and national experts to work with the Smithfield Court residents, the SCG stakeholders, including the City (Co-Applicant and Neighborhood Implementation Entity), Integral Properties/Rule Enterprises (Integral/Rule – Housing Implementation Entity), The Ascent Project (TAP- People/Education Implementation Entity), Birmingham Rouge City Schools (BCS - Principal Education Partner), UAB (Anchor Institution/Evaluation Partner) and the United Way of Central Alabama plays a key partner role repositioning strategy. Through a formal solicitation process, we will select multiple Development Partners that will work with HABD in the redevelopment of existing properties and in development of new replacement project repositioning strategy. Through a formal solicitation process, we will select multiple Development Partners that will work with HABD in the redevelopment of existing properties and in development of new replacement projects

PHA Goal: Increase the public awareness of HABD's resources and programs that are offered to assist in improving the lives of residents

1. Multiple press releases issued about HABD resources and programming including, but not limited to, the Annual Mario Addison Turkey Giveaway, the Affordable

Connectivity Program registration drive, the awarding of HUD's ROSS grant, the HABD and Miles College Community Give Back Day, and the Smithfield Court Choice Neighborhoods grant effort.

2. Improved HABD's working relationships with local news outlets and received media coverage of multiple events, including the Annual Employment and Career Fair, the visit with the Federal Railroad Administrator at Harris Homes, and the Smithfield Court Choice Neighborhoods community and resident meetings.
3. Implemented weekly, recurring updates to all HABD staff through Constant Contact.
4. Implemented weekly, recurring updates to the Board of Commissioners through Constant Contact.
5. Held an all-staff team bonding event to kick off the Magic City Classic and announce the agencies new motto with HABD apparel for team members: Mission Focused, Service Driven.
6. Used feedback and data collected from third-party survey research of residents, staff, and stakeholders to address various needs and concerns.
7. Created and distributed top-of-year newsletters and informational magnets to all residents to keep them informed of HABD happenings.
8. Began the process of working with a third-party web designer to have a new, modernized HABD website in place before mid-2023.
9. Increased social media presence, following, and engagement, particularly in terms of reel/ video views, by using trending sounds to share HABD agency and hiring news.
10. Sponsored the Birmingham Business Journal's 2022 CEO Awards, where President and CEO Dontrelle Young Foster was an awardee.
11. Created and placed an advertisement in the Birmingham Times Magic City Class edition.
12. Procured improved video and audio equipment for the production of greater, more impactful content, including a digital camera, studio lighting and a teleprompter, and lapel microphones.
13. Streamlined communication from HR to staff to minimize the number of emails sent to staff per week from one department.
14. Created and distributed an HABD style guide to staff to ensure all materials from HABD are consistent and align with the professional image we're working to convey.
15. Developed a website specifically for the Smithfield Court Choice Neighborhoods grant initiative, SmithfieldChoice.org.
16. Drafted and sent letters of support to HABD's representatives in Congress for the Neighborhood Homes Investment Act.
17. Supported the NCRC's groundbreaking of 52 new affordable single-family homes in Birmingham's North Pratt community.
18. Participated in the City of Birmingham's Page Pals initiative to strengthen our partnership with the city and provide literacy support to third graders.

Leverage public/private partnerships to provide more resources and opportunities for our residents:

The YouthBuild Grant specifically serves at risk youth ages 16-24 that are current or former high school dropouts with the greatest challenges to finding jobs with a ceiling of over 1.5 million

dollars granted over three years. HABD successfully won \$1.5 million dollars to operate a YouthBuild Program. This will enable us to emphasize the educational opportunities to learn a trade.

AmeriCorps VISTA provides opportunities for Americans 18 years or older from a diverse range of backgrounds to dedicate a year of full-time service with an organization or sponsor to create or expand programs designed to empower individuals and communities in overcoming poverty. Public, private, or faith-based nonprofit organizations as well as local or state agencies can become an AmeriCorps VISTA project sponsor. The goals and objectives of AmeriCorps Vistas are directed towards alleviating problems of low-income communities.

Virtual Village website will be an extension for the services provided by the Campus of Hope/Envision Center. This will allow all of the clients of HABD the ability to receive services.

HABD applied to take part in the FCC's Pilot Program "Your Home Your Internet" (YHYI) for its Affordable Connectivity Program (ACP). The FCC required a two part process of applying through the pilot application portal and in Grants.gov. The total requested funds was **\$262,397.00**. If awarded HABD would have additional resources to provide valuable opportunities to residents not only to have affordable Internet, but to work with HABD in the grant program. In addition, HABD would partner with the City of Birmingham and the Birmingham Public Library to host events and promote the program.

B.4 Statement of Capital Improvements



Required for all PHAs completing this form that administer public housing and receive funding from the Capital Fund Program (CFP).

Capital Fund Program - Five-Year Action Plan

Status: Submitted

Approval Date:

Approved By:

Part I: Summary						
PHA Name : Housing Authority of the Birmingham District			Locality (City/County & State)			
PHA Number: AL001			<input checked="" type="checkbox"/> Original 5-Year Plan		<input type="checkbox"/> Revised 5-Year Plan (Revision No:)	
A.	Development Number and Name	Work Statement for Year 1 2022	Work Statement for Year 2 2023	Work Statement for Year 3 2024	Work Statement for Year 4 2025	Work Statement for Year 5 2026
	AUTHORITY-WIDE	\$5,577,810.00	\$3,600,000.00	\$3,150,000.00	\$2,550,000.00	\$2,100,000.00
	CHARLES P MARKS VILLAGE (AL001000006)	\$6,239,028.00	\$1,400,000.00	\$1,400,000.00	\$1,000,000.00	
	COLLEGEVILLE CENTER (AL001000013)	\$3,845,000.00	\$1,400,000.00	\$1,400,000.00	\$1,000,000.00	
	ELYTON VILLAGE (AL001000001)	\$25,000.00	\$1,400,000.00	\$1,400,000.00	\$100,000.00	
	TOM BROWN VILLAGE (AL001000010)	\$30,000.00	\$1,400,000.00	\$350,000.00	\$950,000.00	
	COOPER GREEN HOMES (AL001000017)	\$20,000.00				
	ROOSEVELT CITY (AL001000023)	\$6,000.00				
	SOUTHTOWN (AL001000004)	\$20,000.00				
	TUXEDO TERRACE/HOPE IV-PHASE I (AL001000034)	\$100,000.00				
	SMITHFIELD COURT (AL001000009)	\$200,000.00	\$1,400,000.00	\$1,400,000.00	\$1,000,000.00	

Capital Fund Program - Five-Year Action Plan

Status: Submitted

Approval Date:

Approved By:

Part I: Summary						
PHA Name : Housing Authority of the Birmingham District		Locality (City/County & State)				
PHA Number: AL001		<input checked="" type="checkbox"/> Original 5-Year Plan		<input type="checkbox"/> Revised 5-Year Plan (Revision No:)		
A.	Development Number and Name	Work Statement for Year 1 2022	Work Statement for Year 2 2023	Work Statement for Year 3 2024	Work Statement for Year 4 2025	Work Statement for Year 5 2026
	REV. DR. MORRELL TODD COMMUNITY (AL001000011)		\$1,400,000.00	\$1,400,000.00	\$1,900,000.00	
	RUSSELL B HARRIS HOMES (AL001000014)					\$4,900,000.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2022				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$5,577,810.00
ID0128	Administration(Administration (1410)-Salaries)	Administration		\$1,606,283.00
ID0129	Operations(Operations (1406))	Operations		\$3,212,567.00
ID0189	Contract Administration Other Fees (Contract Administration (1480)-Other Fees and Costs)	Fees for Real Estate Advisory Consultant		\$258,960.00
ID0193	Contract Administration Fees and Costs(Contract Administration (1480)-Other Fees and Costs)	Environmental Testing; CNA's; Surveys, Appraisals in preparation of repositioning multiple properties.		\$500,000.00
	CHARLES P MARKS VILLAGE (AL001000006)			\$6,239,028.00
ID0151	General Development Activity(Dwelling Unit - Conversion (1480))	Environmental clean up to reposition property under Section 18 and/or RAD.		\$5,939,028.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2022				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0197	Dwelling Unit Interior Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Replace/repair HVAC units.		\$300,000.00
	COLLEGEVILLE CENTER (AL001000013)			\$3,845,000.00
ID0153	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$3,600,000.00
ID0184	Dwelling Unit Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Install CO detectors.		\$45,000.00
ID0195	Dwelling Unit Interior Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Replace/repair HVAC		\$200,000.00
	ELYTON VILLAGE (AL001000001)			\$25,000.00
ID0183	Dwelling Unit Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Installation of CO detectors		\$25,000.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2022				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	TOM BROWN VILLAGE (AL001000010)			\$30,000.00
ID0185	Dwelling Unit Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Install CO Detectors		\$30,000.00
	COOPER GREEN HOMES (AL001000017)			\$20,000.00
ID0186	Dwelling Unit Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Install CO Detectors		\$20,000.00
	ROOSEVELT CITY (AL001000023)			\$6,000.00
ID0187	Dwelling Unit Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Install CO Detectors		\$6,000.00
	SOUTHTOWN (AL001000004)			\$20,000.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2022				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0188	Dwelling Unit Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Install CO Detectors		\$20,000.00
	TUXEDO TERRACE/HOPE IV-PHASE I (AL001000034)			\$100,000.00
ID0194	Dwelling Unit Interior Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Replace/repair HVAC Units		\$100,000.00
	SMITHFIELD COURT (AL001000009)			\$200,000.00
ID0196	Dwelling Unit Interior Mechanical(Dwelling Unit-Interior (1480)-Mechanical)	Replace/repair HVAC		\$200,000.00
	Subtotal of Estimated Cost			\$16,062,838.00

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 2 2023				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	SMITHFIELD COURT (AL001000009)			\$1,400,000.00
ID0167	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$1,400,000.00
	COLLEGEVILLE CENTER (AL001000013)			\$1,400,000.00
ID0169	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$1,400,000.00
	TOM BROWN VILLAGE (AL001000010)			\$1,400,000.00
ID0170	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$1,400,000.00
	REV. DR. MORRELL TODD COMMUNITY (AL001000011)			\$1,400,000.00

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year				
3		2024		
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	COLLEGEVILLE CENTER (AL001000013)			\$1,400,000.00
ID0172	Copy of General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$1,400,000.00
	SMITHFIELD COURT (AL001000009)			\$1,400,000.00
ID0174	Copy of General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$1,400,000.00
	CHARLES P MARKS VILLAGE (AL001000006)			\$1,400,000.00
ID0175	Copy of General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$1,400,000.00
	ELYTON VILLAGE (AL001000001)			\$1,400,000.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)					
Work Statement for Year		4	2025		
Identifier	Development Number/Name	General Description of Major Work Categories		Quantity	Estimated Cost
	CHARLES P MARKS VILLAGE (AL001000006)				\$1,000,000.00
ID0179	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD			\$1,000,000.00
	SMITHFIELD COURT (AL001000009)				\$1,000,000.00
ID0180	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD			\$1,000,000.00
	COLLEGEVILLE CENTER (AL001000013)				\$1,000,000.00
ID0181	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD			\$1,000,000.00
	REV. DR. MORRELL TODD COMMUNITY (AL001000011)				\$1,900,000.00

Capital Fund Program - Five-Year Action Plan

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 5 2026				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$2,100,000.00
ID0190	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Administration		\$700,000.00
ID0191	Operations(Operations (1406))	Operations		\$1,400,000.00
	RUSSELL B HARRIS HOMES (AL001000014)			\$4,900,000.00
ID0192	General Development Activity(Dwelling Unit - Conversion (1480))	Repositioning of public housing through Section 18 and/or RAD		\$4,900,000.00
	Subtotal of Estimated Cost			\$7,000,000.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 1	2022
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Salaries)	\$1,606,283.00
Operations(Operations (1406))	\$3,212,567.00
Contract Administration Other Fees (Contract Administration (1480)-Other Fees and Costs)	\$258,960.00
Contract Administration Fees and Costs(Contract Administration (1480)-Other Fees and Costs)	\$500,000.00
Subtotal of Estimated Cost	\$5,577,810.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 2	2023
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Salaries)	\$1,200,000.00
Operations(Operations (1406))	\$2,400,000.00
Subtotal of Estimated Cost	\$3,600,000.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 3	2024
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Salaries)	\$1,050,000.00
Operations(Operations (1406))	\$2,100,000.00
Subtotal of Estimated Cost	\$3,150,000.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 4	2025
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Salaries)	\$850,000.00
Operations(Operations (1406))	\$1,700,000.00
Subtotal of Estimated Cost	\$2,550,000.00

Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 5	2026
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	\$700,000.00
Operations(Operations (1406))	\$1,400,000.00
Subtotal of Estimated Cost	\$2,100,000.00

B.5 Most Recent Fiscal Year Audit



Recent results of PHA's fiscal year audit. This statement provides the results of the most recent fiscal year audit of the PHA conducted under section 5(h)(2) of the 1937 Act (42 U.S.C. 1437c(h)).



**INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR EACH
 MAJOR FEDERAL PROGRAM AND REPORT ON INTERNAL CONTROL
 OVER COMPLIANCE REQUIRED BY THE UNIFORM GUIDANCE**

Board of Commissioners
 Housing Authority of the Birmingham District
 Birmingham, Alabama

Report on Compliance for Each Major Federal Program

We have audited the Housing Authority of the Birmingham Districts (the Authority) compliance with the types of compliance requirements described in the *OMB Compliance Supplement* that could have a direct and material effect on each of the Authority's major federal programs for the year ended June 30, 2020. The Authority's major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs.

Management's Responsibility

Management is responsible for compliance with federal statutes, regulations, and the terms and conditions of its federal awards applicable to its federal programs.

Auditors' Responsibility

Our responsibility is to express an opinion on compliance for each of the Authority's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the Authority's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our opinion on compliance for each major federal program. However, our audit does not provide a legal determination of the Authority's compliance.

Opinion on Each Major Federal Program

In our opinion, the Authority complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended June 30, 2020.



Report on Internal Control Over Compliance

Management of the Authority is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the Authority's internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major federal program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control over compliance.

A deficiency in internal control over compliance exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. *A material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. *A significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance.

Our consideration of internal control over compliance was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies. We did not identify any deficiencies in internal control over compliance that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.



CliftonLarsonAllen LLP

Lakeland, Florida
September 30, 2021

Section I – Summary of Auditors' Results

Financial Statements

1. Type of auditors' report issued: Unmodified
2. Internal control over financial reporting:
- Material weakness identified? X Yes No
 - Significant deficiency identified? Yes X None Reported
3. Noncompliance material to financial statements noted? Yes X No

Federal Awards

1. Internal control over major federal programs:
- Material weakness identified? Yes X No
 - Significant deficiency identified? Yes X None Reported
2. Type of auditors' report issued on compliance for major federal programs: Unmodified
3. Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)? Yes X No

Identification of Major Federal Programs**CFDA Number**

14.850
14.872

Name of Federal Program or Cluster

Public and Indian Housing
Public Housing Capital Fund (CFP)

Dollar threshold used to distinguish between Type A and Type B programs:

\$2,335,245

Auditee qualified as low-risk auditee?

 Yes X No

Section II – Financial Statement Findings

2020 – 001

Type of Finding: Material Weakness in Internal Control over Financial Reporting

Condition: During the audit period, several audit adjustments were necessary for the financial statements to be reported in accordance with accounting principles generally accepted in the United States of America (U.S. GAAP). In addition, the discretely presented component unit column included entities that should have been reported as related parties, rather than component units.

Criteria or specific requirement: The Authority is responsible for establishing and maintaining internal controls to ensure that transactions are properly reported in the financial statements in accordance with U.S. GAAP.

Context: There were 20 journal entries made during the audit period that were necessary for the financial statements to be properly reported in accordance with U.S. GAAP. Entries were recorded for the year ended June 30, 2020 through May 31, 2021. The most notable financial areas affected by these entries are as follows:

- Cash
- Accounts receivable
- Notes receivable
- Capital assets
- Accounts payable
- Accrued payroll
- Net position
- HUD grant revenue
- Other revenue
- Operating expenses

The exclusion of certain related party entities that were previously reported as discretely presented component units resulted in a restatement of the beginning net position of \$21,361,524.

Effect: Without the aforementioned journal entries, the financial statements would have been materially misstated.

Cause: The Authority had turnover in their CFO position during the year-end close process. During this transitional period, internal controls were not operating effectively to prevent material misstatements from occurring in the financial statements.

Repeat Finding: No

Recommendation: The Authority should implement additional year-end close internal controls. Those controls should include reconciling every account and ensure each reconciliation is reviewed for accuracy.

Views of responsible officials: There is no disagreement.

Section III – Findings and Questioned Costs – Major Federal Programs

Our audit did not disclose any matters required to be reported in accordance with 2 CFR 200.516(a).



President and Chief Executive Officer
David A. Northern, Sr.

HOUSING AUTHORITY OF THE BIRMINGHAM DISTRICT

Board of Commissioners
 Anthony C. Hood, Chairman
 Willie J. Lewis, Vice Chairman
 Cardell Davis, Commissioner
 Dennis G. Pantazis, Jr. Commissioner
 DeJuana J. Thompson, Commissioner

CORRECTIVE ACTION PLAN

The Housing Authority of the Birmingham District respectfully submits the following corrective action plan for the year ended June 30, 2020.

Audit period: July 1, 2019 – June 30, 2020

The findings from the schedule of findings and questioned costs are discussed below. The findings are numbered consistently with the numbers assigned in the schedule.

FINDINGS—FINANCIAL STATEMENT AUDIT

Finding 2020 – 001 – Material Weakness in Internal Control over Financial Reporting

Recommendation: We recommend that the Authority implement additional year-end close internal controls. Those controls should include reconciling every account and ensure each reconciliation is reviewed for accuracy.

Explanation of disagreement with audit finding: There is no disagreement.

Action taken in response to finding: The Authority will implement a year-end closing process to ensure all accounts are properly reconciled. During the year, the Authority faced turnover in the accounting department, which caused internal controls to not operate effectively. The Authority has now recently filled several accounting positions.

Name of the contact person responsible for corrective action: David A. Northern, Sr., Executive Director

Planned completion date for corrective action plan: We expect this finding to be resolved in time for next year's audit.

If the U.S. Department Housing and Urban Development has questions regarding this plan, please call David A. Northern, Sr. at (205) 521-0679.

Sincerely,

David A. Northern, Sr.
 Executive Director

C.1 Resident Advisory Board (RAB) Comments



Narrative to describe the analysis of the RAB recommendations and the decisions made on those recommendations.

**Resident Advisory Board
Comments
February 13, 2023
Smithfield Court Gymnasium**

-
- Jaquice Reynolds - Present (Via Zoom)**
 - Eldridge Knighton - Absent**
 - Willie J. Lewis - Present**
 - Barbara Merchant - Absent**
 - Barbara Sturdivant - Present**
 - Mary Hawkins - Present**
 - Cassidy Moore - Present**
 - Nosayamwen Idemudia - Present**
 - Willine Body - Absent**
 - Shemekia Minter - Present**
 - O’Jore Tamper - Absent**
 - Robin Feagin - Absent**
 - Terri Hammond – Absent**
 - Irene Myles – Present**
 - Stacy Upton – Absent**
 - Durriyyah Abdullah – Absent**
-

**HOUSING AUTHORITY OF THE
BIRMINGHAM DISTRICT**



Annual Plan Comments (Q & A)

1. **RAB Question:** (Income Levels; Closing Application) Is this what we will get 4th Quarter?
HABD Response: No, these are the average incomes for each site.
2. **RAB Question:** I have a question concerning programs. You don't have the certified social workers to teach residents about the programs. You got people out here trying to qualify, but they need a better understanding. People are not getting the right information. People can't meet the criteria and they don't know what the criteria is.
HABD Response: This part is just reflecting the funding for the programs. We could get your name and number to connect you with the ROSS and FSS Coordinators since this section is about the amount of the grant funding, not the programs. We hear you, and will make efforts to have more impactful outreach.
3. **RAB Question:** (Community Engagement/Community Centers) Will the programs be for all of the sites?
HABD Response: Yes.
4. **RAB Comment:** Do you have any updates for North Birmingham Homes?
HABD Response: Operations money goes to all properties to make routine repairs and farther out in the Thrive 2025 plan starting around 2026 improvements are planned for individual locations.
5. **RAB Comment:** I want to know about the yearly budget.
HABD Response: We believe that you are speaking to the tenant participation funds and those funds come from the Operations budget, and are not part of the Capital Fund Program.



C.2 Certification by State or Local Officials



Form HUD 50077-SL, Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan, must be submitted by the PHA as an electronic attachment to the PHA Plan.

C.3 Civil Rights Certification



Form HUD-50077-ST-HCV-HP, PHA Certifications of Compliance with the PHA Plans and Related Regulations, must be submitted by the PHA as an electronic attachment to the PHA Plan